

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

DEMETRICK PENNIE  
a Natural Person and Resident of Texas,  
and Sergeant in the Dallas Police Department,  
on behalf of himself and other law enforcement  
officers deceased or alive similarly situated

and

LARRY KLAYMAN,  
a Natural Person and Resident of Florida,  
on behalf of himself and other law enforcement  
officers deceased or alive similarly situated

Plaintiffs,

v.

LOUIS FARRAKHAN,  
a Natural Person, and Minister and Leader of  
Nation of Islam  
7351 South Stony Island Avenue  
Chicago, Illinois 60649

**AMENDED COMPLAINT**

Civil Action No. 3:16-cv-02010

and

NATION OF ISLAM  
7351 South Stony Island Ave.  
Chicago, IL, 60649

and

REVEREND AL SHARPTON,  
a Natural Person, and founder and President of  
the National Action Network  
106 W. 145th Street  
Harlem, New York 10039

and

NATIONAL ACTION NETWORK,  
106 W. 145<sup>th</sup> Street  
Harlem, NY, 10039

and

**BLACK LIVES MATTER,**  
a Nationwide organization

and

**RASHAD TURNER**  
a Natural Person, and leader of the  
Black Lives Matter movement

and

**OPAL TOMETI,**  
a Natural Person, and co-founder and leader of  
the Black Lives Matter movement and  
#blackLivesMatter network

and

**PATRISSE CULLORS,**  
a Natural Person, and co-founder and leader of  
the Black Lives Matter movement and  
#blackLivesMatter network

and

**ALICIA GARZA,**  
a Natural Person, and co-founder and leader of  
the Black Lives Matter movement and  
#blackLivesMatter network

and

**DERAY MCKESSON**  
a Natural Person, and leader of the  
Black Lives Matter movement

and

**JOHNETTA ELZIE**  
a Natural Person and leader of the  
Black Lives Matter movement

and

NEW BLACK PANTHERS PARTY  
Washington, DC

and

MALIK ZULU SHABAZZ  
a Natural Person, and leader of the  
New Black Panther Party

and

GEORGE SOROS  
a Natural Person and financier of the  
Black Lives Matter movement

and

BARACK HUSSEIN OBAMA,  
acting as President of the United States of America  
1600 Pennsylvania Avenue  
Washington, D.C. 20500

and

ERIC HOLDER,  
a Natural Person, and former Attorney General of  
the United States of America  
Covington & Burling LLP  
One City Center  
850 Tenth Street, NW  
Washington, DC 20001-4956

and

HILLARY CLINTON,  
a Natural Person, and former Secretary of State  
of the United States of America,  
and a resident of New York

Defendants.

**AMENDED COMPLAINT**

In this class action Amended Compliant, Plaintiffs Demetrick Pennie and Larry Klayman (collectively “Plaintiffs” unless individually named), and police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians, sue Defendants Louis Farrakhan, Nation of Islam, Al Sharpton, National Action Network, Black Lives Matter, Rashad Turner, Opal Tometi, Patrisse Cullors, Alicia Garza, Johnetta Elzie, Deray McKesson, New Black Panthers Party, Malik Zulu Shabazz, George Soros, Barack Hussein Obama, Eric Holder, and Hillary Clinton (collectively “Defendants” unless individually named) in their individual and official capacities where applicable, and in support allege as follows:

**I. INTRODUCTION AND NATURE OF THE ACTION**

1. This is an Amended Complaint for damages and equitable relief arising out of the threats, severe bodily injury and/or deaths, future deaths, emotional harm, and imminent fears of death and/or serious bodily harm resulting from Defendants’ actions. Defendants have repeatedly incited their supporters and others to engage in threats of and attacks to cause serious bodily injury or death upon police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians. Thus, Defendants, each and every one of them, jointly and severally, conspiring and/or acting in concert either expressly or otherwise, are inciting and causing serious bodily injury or death to police officers and other law enforcement persons of all races and ethnicities, Jews, and Caucasians.

2. This is a civil action for the deprivation of Plaintiffs and other members of the class herein of their civil rights, conspiracy against the Plaintiffs and other members of the class herein civil rights and obstruction of justice to prevent the enforcement of civil rights, relief pursuant to *Bivens v. Six Unknown Named Agents*, 403 U.S. 388 (1971), assault, and intentional

infliction of emotional distress resulting from the incitement of violent attacks that have led to the murders of, and have caused serious bodily injuries to police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians.

3. Directing, provoking and even inciting individuals and angry crowds to violence is illegal, as illuminated by the U.S. Supreme Court in *Brandenburg v. Ohio*, 395 U.S. 444 (1969).

**II. CLASS ACTION STATUS**

4. Plaintiffs and other members of the class herein reserve the right to move the Court to certify this case and its causes of action as a class action pursuant to Federal Rules of Civil Procedure Rule 23.

5. The class proposed by Plaintiffs includes all police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians who have been threatened and targeted and harmed by the Defendants' ignited race war, and who reside within this district and the domestic United States.

**III. JURISDICTION AND VENUE**

6. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331, 28 U.S.C. § 1332(a)(2), as a civil action brought by citizens of the United States.

7. This Court also has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1605 (general exceptions to jurisdictional immunity).

8. This Court also has subject matter jurisdiction over this action based on diversity of citizenship pursuant to 28 U.S.C. § 1332(a)(2), because there is complete diversity of citizenship between the Plaintiff and the Defendants.

9. On information and belief, the citizenship of the Defendants is:

- a. Louis Farrakhan, Illinois
- b. Nation of Islam, Illinois
- c. Al Sharpton, Harlem, New York
- d. National Action Network, Harlem, New York
- e. Black Lives Matter, Nationwide
- f. Mr. Rashad Turner, St. Paul, Minnesota

- g. Ms. Opal Tometi, State of New York
- h. Ms. Patrisse Cullors, Los Angeles, California
- i. Ms. Alicia Garza, San Francisco, California
- j. Ms. Johnetta Elzie, Chicago, Illinois
- k. Mr. DeRay McKesson, Baltimore, Maryland
- l. Mr. Malik Zulu Shabazz, Washington, D.C.
- m. New Black Panther Party, Baltimore, Maryland
- n. Mr. George Soros, Katonah, New York
- o. Mr. Barack Obama, Illinois
- p. Mr. Eric Holder, Washington, D.C.
- q. Ms. Hillary Clinton, New York

10. Jurisdiction is also proper under *Bivens v. Six Unknown Named Agents*, 403 U.S. 388 (1971), in so far as the actions violate the 1<sup>st</sup>, 4<sup>th</sup>, 5<sup>th</sup>, and 14<sup>th</sup> Amendments to the U.S. Constitution.

11. Jurisdiction is also proper under 42 U.S.C. § 1983 and 42 U.S.C. § 1985 as questions of federal law.

12. The matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

13. This Court also has supplemental jurisdiction over this action pursuant to 28 U.S.C. § 1367.

14. Venue is proper in this district pursuant to 18 U.S.C. § 2334(a) and 28 U.S.C. §§ 1391(b) and 1391(d) because harm from the actions of the individual defendants acting in concert and individually occurred in this District in Dallas, Texas, when twelve police officers

were shot, five dead at this writing, and seven were seriously or critically wounded, within this District on July 7, 2016. In addition, there have been continuing threats of serious bodily injury and death against the Plaintiffs and those similarly situated.

**IV. STANDING AND THE INDIVIDUAL PLAINTIFF PARTIES**

15. Demetrick Pennie (“Pennie”) has served as a police officer for seventeen years and is now a sergeant with the Dallas Police Department. Pennie is over the age of 18. Pennie served as a Corporal in the United States Army from 1995 until 1999 and then as an E-4 Specialist, when he was honorably discharged. Pennie holds a Bachelors Degree from Midwestern State University, a Masters Degree from Prairie View A&M University, and is in his final semester of his PhD program at Texas Tech University. Pennie is also the president of the Dallas Fallen Officer Foundation, which is a police support organization designed to assist the families of police officers threatened, killed or critically injured in the line of duty. Pennie has been threatened with death and/or serious bodily harm by Defendants, acting alone and/or in concert.

16. Plaintiff Larry Klayman (“Klayman”) is a Florida citizen, who is a Caucasian messianic Jew. Klayman is a part of law enforcement as a former federal prosecutor of the U.S. Department of Justice, as a former public official as a candidate for U.S. Senate, as the founder of Judicial Watch and Freedom Watch whose mission is to enforce the rule of law and fight against racism, public corruption, and to further civil rights and equality for all persons under the U.S. Constitution. Klayman has been highly visible and active in defending police, other law enforcement officials, Jews, Christians and Israel and opposing Defendants’ efforts to stir up racial, ethnic and religious conflict to suit their agendas in every area of American life in court and in public. At all times relevant to this action, Klayman has been present in the United States

of America before and at the time that innocent police officers and other law enforcement officials of all races, ethnicities have been subjected to threats and actual violence that has resulted in severe bodily injury or death as a result of Defendants' promotion and incitement of riots and violent acts including the killing and serious bodily injury against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians. He has also been present before and at the time Defendants called for and incited such violence. He was subject to, and continues to be subject to, fear and intimidation of serious bodily injury or death by those who wish to harm him and police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians in unlawful acts to promote and implement a race war. As a high profile Caucasian messianic Jew, Klayman imminently fears great bodily and death and thus harm as a result of Defendants' promotion and incitement of riots and violent acts, including death and great bodily harm, against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians. Klayman and his family has already been so threatened with serious bodily injury or death since the filing of the initial complaint. As grounds for leave to amend, after Klayman filed the initial complaint, Klayman received a call from Defendant New Black Panther Party and Black Lives Matter acting in concert with the other Defendants, all of whom are working together to ignite and continue the race war they have fomented, threatening to kill him and his family, saying, "**you cracker...you broke with the Black Panthers and the black lives matter and all black people in this country. God probably alone. You should be worried about the [safety of] you[r] whole goddamn family.**" (Docket No. 12, Ex. A). Plaintiff Klayman is an officer of this Court and

thus at all times has been present before this Court in this District, as well a counsel on this case.

This conduct amounts to obstruction of justice and other crimes.

**V. FACTS COMMON TO ALL COUNTS**

17. The inevitable, entirely foreseeable, and predictable result directly and proximately caused by the war on police and law enforcement incited by each and ever Defendants came to a head on July 7, 2016 in Dallas, Texas. At around 9:00 p.m., on July 7, 2016, at a "Black Live Matters" protest, at least one sniper shot twelve (12) police officers that were on duty to keep the peace at the rally. ("Dallas Police Shooting").

18. Of the twelve (12) police officers that were shot during the Dallas Police Shooting, five (5) were killed and seven (7) seriously wounded.

19. The perpetrator of the Dallas Police Shooting Micah Johnson ("Johnson") took position in a parking garage high above the protest so that he could pick off the police officers from a high angle and altitude without hitting anyone else in the parade but police officers. As the Washington Post reported:

Videos circulating on social media showed an individual with an assault-style rifle shoot a police officer in the back at point-blank range.

A gunman, believed to be the same shooter, then engaged in a violent, three-hour standoff with SWAT officers, police said. Brown said the attacker was killed when police detonated an explosive device near him after a hostage negotiator spoke with him.

During this standoff, Brown said the suspect, who was not identified, told police that "he was upset about Black Lives Matter" and angered by the recent police shootings in Louisiana and Minnesota that dominated national news this week.

"He said he was upset about the recent police shootings," Brown said during a Friday morning news conference. "The suspect said

he was upset at white people. The suspect stated he wanted to kill white people, especially white officers.”

Dallas Mayor Mike Rawlings told CBS News that in addition to the dozen officers shot, two other people also wounded by gunfire, though their conditions were not immediately known.

“No words to describe the atrocity that happened to our city,” Brown said. “All I know is this must stop, this divisiveness between our police and our citizens.”<sup>1</sup>

20. According to The Washington Post "The Dallas police chief said [Johnson] told authorities 'he was upset about the recent police shootings' and 'wanted to kill white people, especially white officers.'"<sup>2</sup>

21. Thus, Johnson systematically and intentionally picked off 12 police officers while largely ignoring the rest of the crowd who were not police and law enforcement.

22. The Daily Caller similarly reported the statements by Johnson:

Dallas police chief David Brown announced at a press conference Friday morning that one of the suspects in Thursday night's sniper attacks that left five officers dead and seven others wounded told authorities his motivation for the shooting was that he was “upset about Black Lives Matter” and “wanted to kill white people,” especially white police officers.

“The suspect said, he was upset about Black Lives Matter. He said, he was upset about the recent police shootings. The suspect said he was upset at white people. The suspect said he wanted to kill white people, especially white officers. The suspect stated that we will eventually find the IEDs,” Brown said. “The suspect stated that he was not affiliated with any groups and he stated that he did this alone.”<sup>3</sup>

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<sup>1</sup> *Id.*

<sup>2</sup> Tim Madigan, Michael E. Miller, Travis M. Andrews and Mark Berman, "Snipers kill five police officers in Dallas, wound seven others during protest," The Washington Post, July 8, 2016, accessible at: [https://www.washingtonpost.com/news/morning-mix/wp/2016/07/08/like-a-little-war-snipers-shoot-11-police-officers-during-dallas-protest-march-killing-five/?hpid=hp\\_rhp-top-table-main\\_mm-dallas-1120pm-6a%3Ahompage%2Fstory](https://www.washingtonpost.com/news/morning-mix/wp/2016/07/08/like-a-little-war-snipers-shoot-11-police-officers-during-dallas-protest-march-killing-five/?hpid=hp_rhp-top-table-main_mm-dallas-1120pm-6a%3Ahompage%2Fstory)

<sup>3</sup> Peter Hasson, "Police: Dallas Suspect 'Upset About Black Lives Matter,' 'Wanted To Kill White People,'" Daily Caller, July 8, 2016, accessible at <http://dailycaller.com/2016/07/08/police-dallas-suspect-upset-about-black-lives-matter-wanted-to-kill-white-people/#ixzz4Dpv3nyCs>

23. The Guardian further reported:

The shooting marked the deadliest attack on law enforcement officers since 9/11 and threatened to inject yet more tension into the already divisive debate over racial disparities in US policing.<sup>4</sup>

24. Investigation into Johnson's background revealed that Johnson was and is a member of Defendant Nation of Islam ("NOI") and Defendant New Black Panther Party ("NBPP"). The Dallas Police Shooting was perpetrated by Johnson under the direction of Defendants NOI and NBPP, in furtherance of Defendants' NOI and NBPP's historical and undeniable mission to incite and effect violence and severe bodily injury and death against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians.<sup>5</sup> This violence was also incited and caused by the other Defendants, each and every one of them.

25. Additionally, Col. Derek Harvey ("Harvey") determined that the Black Lives Matter Defendants ("BLM Defendants") were directly and proximately responsible for the Dallas Police Shootings, as well as the overall increase in violence against police officers and law enforcement. Harvey was the first Director of the Afghanistan-Pakistan Center of Excellence at U.S. Central Command (CENTCOM) and a retired United States Army Colonel. He was selected by General David Petraeus in 2009 to lead the new organization. Harvey is a Senior Executive Service-member of the Defense Intelligence Agency (DIA), and was the previous senior analytical specialist for Iraq to Petraeus, then Commander, Multi-National Forces-Iraq.

26. Harvey stated on Fox News at 11:20 a.m. on July 8, 2016, that Black Lives Matter directly caused and incited the shooting of 12 police officers in Dallas, Texas, on July 8, 2016.

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<sup>4</sup> *Id.*

<sup>5</sup> Pamela Geller, *Dallas Mass Cop Murderer was Follower of Nation of Islam*, July 8, 2016, available at: <http://pamelageller.com/2016/07/dallas-mass-cop-murderer-was-follower-of-nation-of-islam.html/>

27. By the acts alleged herein, Defendants, each and every one of them, acting in concert and as part of a conspiracy have incited committed unlawful acts including violent riots, assaults and murders of police, and acts of violence, including seriously bodily injury or death, against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians. In a classic form of illegal incitement to imminent violence of individuals and an angry mob, Defendants, acting in concert, and each and every one of them are inciting the imminent serious bodily injury and killing of police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians by telling and pressuring their supporters and others that there is a war between blacks and law enforcement, thereby calling for immediate violence and severe bodily injury or death. Defendants incite people to violence and cause violence by telling those people that they are under attack. Defendants are encouraging disaffected blacks, Black Muslims, Muslims and others allied with them including certain whites to ignore, disrespect, and assault law enforcement officials, and commit violence and lethal force.

28. The Defendants acting in concert and each of them have publicly incited people to violence with the fiction that police and other law enforcement officers (including many black and minority police officers) are intentionally and systematically targeting and hunting blacks and other minorities to kill them for no reason other than racism or sport.

29. The Defendants acting in concert and each of them have publicly incited people with the fiction that police and other law enforcement officers (including many black and minority police officers) are intentionally and knowingly arresting and prosecuting blacks and other minorities who have not committed a crime.

30. The Defendants acting in concert and each of them have publicly incited people to violence against the Plaintiff and other members of the class herein with the fiction that blacks and other minorities are being arrested and prosecuted disproportionately to the crimes that individual arrestees actually committed.

31. As a direct and proximate result of Defendants' race war against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians, intimidating and threatening law enforcement from doing their duties, more than 30 major U.S. cities have reported increases in violence from a year ago.<sup>6</sup>

32. "The equilibrium has changed between police and offenders," said Alfred Blumstein, a professor and a criminologist at Heinz College, Carnegie Mellon University.<sup>7</sup>

33. As even The New York Times must reluctantly concede, "Among some experts and rank-and-file officers, the notion that less aggressive policing has emboldened criminals — known as the "Ferguson effect" in some circles — is a popular theory for the uptick in violence."<sup>8</sup>

34. Murders in the city of Chicago have increased by about 20% over the last year, primarily in low-income, urban areas susceptible to the Defendants' mission to incite lethal violence against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians. Over 500 persons, mostly black, have already been murdered this year primarily by other blacks and people of mixed race as a result.

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<sup>6</sup> Monica Davey & Mitch Smithaugh, "Murder Rates Rising Sharply in Many U.S. Cities," The New York Times, August 31, 2015, available at <http://www.nytimes.com/2015/09/01/us/murder-rates-rising-sharply-in-many-us-cities.html/>

<sup>7</sup> *Id.*

<sup>8</sup> *Id. (Emphasis added.)*

35. Murders in the city of Baltimore have soared by 56% over the last year as a direct and proximate consequence of the Defendants' war on police and law enforcement, intimidating and threatening police with prosecution for doing their jobs, encouraging criminals that the police are being restrained and held back from enforcing the law, and inciting criminals with rationalizations, pretexts, and excuses for their looting, crimes, and murder in the name of the grievances spread by the Defendants.

36. Milwaukee, Wisconsin, experienced a 76 percent increase in murder over the same period last year, with 104 people killed so far this year.

37. In St. Louis, Missouri, 136 people had been killed this year, a 60 percent rise from the 85 murders the city had during the same time last year.

38. In New Orleans, 120 people have been killed by late August 2015, compared with 98 during the same period a year ago.

39. In Washington, D.C., murders totaled 105, compared with 73 people a year ago.

40. In New York, New York, killings have increased by about 9 percent, to 208 through mid-August from 190 a year earlier.

41. When no police officers were indicted in the death of Eric Garner in New York City, the Mayor of New York City, William de Blasio, stigmatized and defamed his own New York City's police department as racists and bullies who need to be reigned in and retrained, thus justifying and excuses the violent attacks upon police officers.

42. Since Defendants always condemning injury or death of black people, but almost never white people, Defendants send the clear signal that it is acceptable and required to kill white people, especially white police officers and other law enforcement.

43. Defendant Barack Obama's ("Defendant Obama") War on the Police is directly endangering the public safety of all Americans, but particularly placing in danger law enforcement, members of the legal system, judges, prosecutors, and lawyers:

The number of uniformed officers in the mid-Atlantic city [Baltimore, Maryland] fell 6.1 percent last year and has shrunk by even more in the first half of this year, according to police data seen by Reuters and not previously reported.

The fall in 2015 was the biggest decline in police numbers among nine comparably-sized U.S. cities reviewed by Reuters. The police force in Detroit and El Paso shrank by 4.9 percent and 4.3 percent, respectively, while Denver and Las Vegas saw increases of over 5 percent.

The reasons for the fall are unclear, but it comes at a difficult time when the number of murders and other violent crimes have risen sharply in Baltimore and many other U.S. cities.<sup>9</sup>

44. On July 7, 2016, Defendant Obama accused the U.S. legal system -- presumably including this Court -- of a conspiracy to kill Black men. In his statement he said:

"What's clear is that these fatal shootings are not isolated incidents. They are symptomatic of the broader challenges within our criminal justice system, the racial disparities that appear across the system year after year, and the resulting lack of trust that exists between law enforcement and too many of the communities they serve."<sup>10</sup>

45. Clearly, the accusation that shootings "are not an isolated incident" is an incitement claiming that there is a knowing, intentional related and connected conspiracy -- "not isolated incidents" -- to intentionally murder Black people.

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<sup>9</sup> Scott Malone, "Baltimore Saw Steep Fall in Police Numbers as Murder Rate Soared," Reuters, July 7, 2016, accessible at: <http://www.reuters.com/article/us-baltimore-police-hiring-insight-idUSKCN0ZN0BF>

<sup>10</sup> Leonard Greene, "President Obama gives voice to police brutality victims after Alton Sterling, Philando Castile shootings," New York Daily News, accessible at: <http://www.nydailynews.com/news/politics/president-obama-voice-police-brutality-victims-article-1.2703404> (emphasis added).

46. On August 28, 2015, in Cypress, Texas, in Harris County, black gunman Shannon J. Miles ("Miles") approached Deputy Darren Goforth (a 10-year veteran of the Harris County Sheriff's Office) from behind and killed him execution-style as he was pumping gas at a Chevron gas station.<sup>11</sup> Officials found 15 shell-casings at the scene,<sup>12</sup> indicating that Miles had fired 15 shots at Deputy Goforth. As reported, Deputy Goforth never drew nor fired his weapon.

47. Investigators found no provocation that might have set off the attack nor any connection or relationship between Deputy Goforth and his assassin Miles, leading together with the setting at a gas station and circumstances to the conclusion that Miles assassinated Goforth purely because Goforth was a law enforcement officer.

48. At a news conference, Harris County Sheriff Ron Hickman said that Deputy Goforth "was a target because he wore a uniform," as Deputy Goforth had no previous contact with the suspect.<sup>13</sup>

49. Harris County Sheriff Ron Hickman and Harris County District Attorney Devon Anderson pushed back against the criticism of police, as Hickman stated, "We've heard Black Lives Matter, All Lives Matter. Well, cops' lives matter, too."<sup>14</sup>

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<sup>11</sup> Manny Fernandez and David Montgomery, "Texas Deputy Killed 'Because He Wore a Uniform,' Sheriff Says," The New York Times, August 29, 2015, accessible at: [http://www.nytimes.com/2015/08/30/us/shooting-of-texas-deputy-is-called-coldblooded-execution.html?\\_r=0](http://www.nytimes.com/2015/08/30/us/shooting-of-texas-deputy-is-called-coldblooded-execution.html?_r=0)

<sup>12</sup> Emily Shapiro, "Suspect Allegedly Unloaded His Entire Pistol in Texas Deputy," ABC News / Good Morning America, August 31, 2015, accessible at: <http://abcnews.go.com/US/suspect-allegedly-unloaded-entire-pistol-texas-deputy/story?id=33430131>

<sup>13</sup> "Texas Deputy Killed 'Because He Wore a Uniform,' Sheriff Says," The New York Times, August 29, 2015, *supra*.

<sup>14</sup> "Sheriff links "Black Lives Matter" movement to slain deputy," CBS News, August 31, 2015, 9:52 accessible at: <http://www.cbsnews.com/news/darren-goforth-killing-sheriff-cites-black-lives-matter-movement/>

50. Officials investigating the execution have tied the attack by Miles to the wave of protests across the country over police shootings, including the demonstrations after the deaths of Michael Brown and Eric Garner.<sup>15</sup>

51. Similarly, on September 1, 2015, only a few days after the murder of Goforth, Police Officer Joseph Gliniewicz was shot and killed in Fox Lake, Illinois,<sup>16</sup> prompting a manhunt for his two killers still underway at this writing.

52. Defendant George Soros ("Defendant Soros") has served as the financier of the BLM Defendants and other similar organizations with the goal of inciting a race war and inciting and advocating deadly violence against law enforcement officers, Caucasians, and Jews. Soros has given at least \$33 million in one year to support of these organizations.<sup>17</sup>

53. Defendants Obama, Eric Holder ("Defendant Holder"), and Hillary Clinton ("Defendant Clinton") used their positions of great authority and influence to perpetrate, incite, condone, ratify and further propagate the hateful message and incitements to violence from co-Defendants NOI, NBPP, and the BLM Defendants.<sup>18</sup>

54. Defendants, each and every one of them, have engaged in a pattern and practice of either directly inciting acts of violence against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians to

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<sup>15</sup> "Texas Deputy Killed 'Because He Wore a Uniform,' Sheriff Says," The New York Times, August 29, 2015, *supra*.

<sup>16</sup> 'Blue and Brave': Illinois town rallies around police as search for officer's killer goes on," Fox News, September 02, 2015, accessible at: <http://www.foxnews.com/us/2015/09/01/manhunt-on-for-gunner-after-cop-reportedly-killed-in-chicago/>

<sup>17</sup> Washington Times, George Soros Funds Ferguson Protests, Hopes to Spur Civil Action, <http://www.washingtontimes.com/news/2015/jan/14/george-soros-funds-ferguson-protests-hopes-to-spur/>

<sup>18</sup> Ben Shapiro, "Obama, Holder, Sharpton Stoke Flames, Ferguson Officers Shot," Breitbart, March 12, 2015, accessible at: <http://www.breitbart.com/big-government/2015/03/12/obama-holder-sharpton-stoke-flames-ferguson-officers-shot/>

perpetrate, incite, condone, ratify and further propagate the hateful message in order to incite a racial war in America.

**A. Defendant Louis Farrakhan**

55. Defendant Louis Farrakhan (“Defendant Farrakhan”) is the current leader of Defendant NOI, a group which has firmly established its hostile and deeply racist, anti-Semitic, and anti-gay agenda and mission, and has announced those positions publically through its actions and words.

56. In furtherance of the hateful and violent dogmatic beliefs and principles of Defendant NOI, and of his own interests, Defendant Farrakhan has engaged in a pattern and practice of advocating for and inciting deadly violence against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians.

57. On March 5, 2015, Defendant Farrakhan incited Black members of the U.S. military to desert and engage in mutiny and violent insurrection against their country.

58. Specifically referring to the deaths of Michael Brown, Tamir Rice and Eric Garner, among others, during encounters with the police, Farrakhan incited the crowd that day that --

If the government cannot protect our lives ... why are you in the Armed Forces, fighting for a democracy that you don't have at home? Why are you in the Armed Forces of America going overseas to fight somebody that never did a thing to you and act pitiful when your own people are shot down in front of you?

And:

I'm calling on all the soldiers that fight for America, come home and let's unite and fight for our lives that the federal government refuses to fight for us. Then we must fight for ourselves.<sup>19</sup>

59. During the speech, Farrakhan held up the deaths of Michael Brown, Tamir Rice and Eric Garner as evidence that there is inequality in the treatment of black citizens, who must therefore wage war against and severely harm and kill police officers and other law enforcement.

60. Then Farrakhan reinforced this call for violence by sharing a link to the video of his speech, which he had posted on Facebook, through his official Twitter account, with the explanation, "Why I'm calling on all black soldiers in the U.S. Armed Forces to come home, unite & fight for our own lives."

61. Farrakhan's incitement to armed conflict of black active-duty members of the military to engage in armed insurrection against U.S. society also includes inciting black military veterans.

62. On November 22, 2014, Farrakhan spoke to a packed auditorium at the Murphy Fine Arts Center at Morgan State University in Baltimore, Maryland. More than 2,000 people including students, community leaders and distinguished guests came to hear the lecture by the 81 one-year old Nation of Islam leader.<sup>20</sup>

63. During the speech, Louis Farrakhan urged retaliation by violent conflict for the death of Michael Brown, a thief who was shot and killed by a Caucasian police officer in Ferguson, Missouri.

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<sup>19</sup> Video of Farrakhan's speech posted at: Billy Hallowell, "Did Louis Farrakhan Just Call for Armed Resistance? Minister's Fiery Call to all 'Black Soldiers in the U.S. Armed Forces' to 'Come Home, Unite and Fight,'" March 5, 2015, accessible at <http://www.theblaze.com/stories/2015/03/05/did-louis-farrakhan-just-call-for-armed-resistance-ministers-fiery-call-to-all-black-soldiers-in-the-u-s-armed-forces-to-come-home-unite-and-fight/#sthash.GoVh5b3s.dpuf>

<sup>20</sup> Askia Muhammad, "'We need Minister Farrakhan' say Black college students," The Final Call, November 25, 2014, accessible at: [http://www.finalcall.com/artman/publish/National\\_News\\_2/article\\_101953.shtml](http://www.finalcall.com/artman/publish/National_News_2/article_101953.shtml)

64. Defendant Farrakhan explicitly and specifically sought to stop black community leaders from discouraging the violent revolution, riots, and crime waves that he was calling for.

65. Defendant Farrakhan directed his attacks at other black leaders, but attacked them for discouraging riots and violence:

"But time has moved on. Your day of leading our people is over," he said. Then he turned to his fellow preachers and repeated the admonition. "You preachers — *your day of being the pacifier for the white man's tyranny on black people is over. You've got to know they're not going to hear you anymore.*"

(*Emphasis added.*)<sup>21</sup> Defendant Farrakhan condemned others for trying to prevent violence.

66. Defendant Farrakhan called for further violence in Ferguson, Missouri, and clarified his condemnation of other leaders who are trying to avoid the violence:

"They know an explosion is going to come," the Nation of Islam leader said to cheers from the more than 2,000 people crowding the university's Murphy Fine Arts Center. "You leaders are the worst."

67. At one point, Defendant Farrakhan held up what resembled a Quran inside the public school, saying that both the central religious text of Islam and the Bible require a "law of retaliation" and the punishment of "a life for a life."<sup>22</sup>

68. In response to Defendant Farrakhan's calls for "a life for a life", Ismaaiyl Abdullah Brinsley ("Brinsley") brutally executed two New York City police officers only 28 days after Farrakhan's November 22, 2014, incitement to violence. Those two uniformed NYPD officers were shot dead as they sat in their marked police car on a Brooklyn street corner by

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<sup>21</sup> Doug Donovan, "Speaking at Morgan, Farrakhan predicts violence in Ferguson," The Baltimore Sun, November 22, 2014, <http://www.baltimoresun.com/news/maryland/baltimore-city/bs-md-farrakhan-morgan-20141122-story.html>

<sup>22</sup> Eric Owens, "Louis Farrakhan Urged 'Retaliation' For Michael Brown A Month Before Ismaaiyl Abdullah Brinsley Executed NYPD Cops," Daily Caller, January 2, 2015, accessible at: <http://dailycaller.com/2015/01/02/louis-farrakhan-urged-retaliation-for-michael-brown-a-month-before-nypd-cops-executed/>

Brinsley's assassination-style mission to avenge Eric Garner and Michael Brown. There was no warning, no provocation, no other interaction — the two police officers were simply assassinated, targeted for wearing a police uniform.<sup>23</sup>

69. Just three hours before shooting of the two officers, vile anti-police threats were posted to Brinsley's Instagram page. The threats referenced the recent police-involved killings of Eric Garner and Michael Brown. Brinsley wrote, "I'm Putting Wings on Pigs Today" and "They Take 1 Of Ours . . . Let's Take 2 of Theirs."<sup>24</sup>

70. In August 2015, Defendant Farrakhan delivered a speech at Mt. Zion Baptist Church in Miami, Florida again inciting 10,000 black volunteers to mobilize and kill police officers, Jews, and Caucasian Americans in retaliation of the oppression of black people.<sup>25</sup>

71. Defendant Farrakhan called for angry blacks to "stalk them and kill them" (Jews and Caucasians) as the "400-year old enemy."

72. Farrakhan explicitly incited "10,000 fearless men" to commit imminent violence saying "rise up and kill those who kill us; stalk them and kill them and let them feel the pain of death that we are feeling!"<sup>26</sup>

73. Referring to a million as being the "Million Man March" in Washington, D.C., Farrakhan further incited "I'm looking for 10,000 in the midst of a million. Ten thousand fearless men who say death is sweeter than continued life under tyranny." <sup>27</sup>

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<sup>23</sup> Larry Celona, Shawn Cohen, Jamie Schram, Amber Jamieson and Laura Italiano, "Gunman executes 2 NYPD cops in Garner 'revenge,'" The New York Post, December 20, 2014, accessible at:

<http://nypost.com/2014/12/20/2-nypd-cops-shot-execution-style-in-brooklyn/>

<sup>24</sup> *Id.*

<sup>25</sup> See also Farrakhan's Facebook Page

<https://www.facebook.com/OfficialMinisterFarrakhan/videos/vb.365178373589441/845109225596351/>

<sup>26</sup> Pam Key, "Farrakhan: We Must Rise Up and Kill Those Who Kill Us; Stalk Them and Kill Them," Breitbart, August 4, 2015, accessible at <http://www.breitbart.com/video/2015/08/04/farrakhan-we-must-rise-up-and-kill-those-who-kill-us-stalk-them-and-kill-them/>

74. Farrakhan incited blacks, with an appeal of being heroes in the race war cause, to “stalk them and kill them” referring to any and all Caucasians and especially police officers of all races and ethnicities.

75. Defendant Farrakhan called for the imminent killing of police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians when he demanded that “if the federal government will not intercede in our affairs, then we must rise up and kill those who kill us, stalk them and let them feel the pain of death that we are feeling!”<sup>28</sup>

76. Defendant Farrakhan further stated that “Death is sweeter than watching us slaughter each other to the joy of a 400-year-old enemy. Death is sweeter. The Qur'an teaches persecution is worse than slaughter then it says, retaliation is prescribed in matters of the slain. Retaliation is a prescription from God to calm the breasts of those whose children have been slain.”<sup>29</sup>

77. On June 24, 2015, appearing in the course of the same “Justice or Else! Tour” at the Metropolitan African Methodist Episcopal church in Washington DC, Farrakhan gave an impassioned speech denouncing America<sup>30</sup> and aligning all white Americans with the sentiments of the racist murderer in Charleston, South Carolina, Dylan Roof.<sup>31</sup>

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<sup>27</sup> “Farrakhan speaks on 'Law of Retaliation,'" The Final Call - Uncompromised News & Perspectives, August 3, 2015, accessible at: <https://www.youtube.com/watch?v=Zr4bYXK7je8>

<sup>28</sup> *Id.*

<sup>29</sup> Richard B. Muhammad and Janiah Muhammad, "We are not asking for justice, we are demanding justice," The Final Call, August 4, 2015, accessible at [http://www.finalcall.com/artman/publish/National\\_News\\_2/article\\_102517.shtml](http://www.finalcall.com/artman/publish/National_News_2/article_102517.shtml)

<sup>30</sup> Gregory Tomlin, "'Stalk them and kill them,' Farrakhan says, calling for 10,000 volunteers to kill whites," Christian Examiner, August 5, 2015, accessible at <http://www.christianexaminer.com/article/farrakhan.calls.for.10000.volunteers.to.kill.whites/49329.htm>.

<sup>31</sup> Matthew Maule, "Farrakhan Exploits Charleston Tragedy," June 30, 2015, <http://www.christianpost.com/news/farrakhan-exploits-charleston-tragedy-140998/#wwOk9TDoEa6wPVSp.99>

78. In his speech, Defendant Farrakhan explicitly called for murder, stating, “Retaliation is a prescription from God to calm the breasts of those whose children have been slain. So if the federal government will not intercede in our affairs, then we must rise up and kill those who kill us. Stalk them and kill them and let them feel the pain of death that we are feeling.”<sup>32</sup>

79. Defendant Farrakhan continued by saying, “Death is sweeter than watching us slaughter each other to the joy of a 400 year old enemy. Death is sweet. The Quran teaches persecution is worse than slaughter.”<sup>33</sup>

80. Speaking of the white people of Charleston that joined in the services, vigils, and marches in sympathy with the black victims, Defendant Farrakhan shouted,

“White folks march with you because they don't want you upsetting the city. They don't give a damn about them nine” [the nine black church-goers murdered in a prayer meeting].

81. Because the Charleston, South Carolina, police fed the murderer, as required, shortly after he was arrested, Defendant Farrakhan accused the Charleston police of supporting the murders and praising the murderer Dylann Roof, slanderously proclaiming an inflammatory lie, which Defendant Farrakhan knew to be false, but knew would incite violence:

“And you know what they [the police] were saying? 'You did a good job killing all them [racial epithet].' You think they were sympathetic? If they were sympathetic with us they would have snatched him, put him in chains, had the gun on him.”

82. In fact, news photographs show that the murderer Dylann Roof was arrested in handcuffs by the Charleston, South Carolina police. Law enforcement cannot hold a criminal in detention and deprive them of food. Yet Defendant Farrakhan sought to further lie to further

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<sup>32</sup> Tomlin, supra note 24.

<sup>33</sup> *Id.*

incite violence by claiming that feeding a suspect in jail awaiting trial means that the police support, approve of, and assisted the murders by Dylann Roof

83. This speech received thunderous applause and cheers in the historic Metropolitan AME Church in Washington D.C., called the “National Cathedral of African Methodism.”

84. That is, while all of Charleston, South Carolina’s churches and community leaders were standing together in unity, appealing for calm, black and white pastors standing side-by-side, Farrakhan was seeking to destroy any sense of unity, calm, or forgiveness.

85. Less than a month after Farrakhan’s speech, on August 26, 2015, a black male named Bryce Williams (“Williams”) executed two of his Caucasian former co-workers filming a tourism story at an idyllic lake in Moneta, Virginia, who worked for a small-town Roanoke, Virginia news station, live on television and then posted disturbing first-person video of the attack on social media.<sup>34</sup>

86. Williams was neither crazy nor acting out of anger but making a political statement and hate crime. Demonstrating that Williams’ double homicide was part of the political movement to effect a race war, Williams not only videotaped the entire incident in the format of news coverage but also carefully waited until the news crew anchorman panned his television camera, then broadcasting live, away from the lake and back to capture the murder live on television.

87. Before police caught Williams, Williams took to Twitter to explain his reasons for killing his former coworkers. Williams wrote that one of his victims made “racist comments”

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<sup>34</sup> Chris Pleasance and Ashley Collman, “Revenge race murder: Bitter black reporter who gunned down white ex-colleagues live on air and posted the video online blames Charleston shootings and anti-gay harassment in manifesto,” The Daily Mail, August 27, 2015, accessible at: <http://www.dailymail.co.uk/news/article-3211529/WDBJ7-reporter-Alison-Parker-Adam-Ward-shot-live-TV-Moneta-gunner.html>

and that a complaint was filed against her through the equal employment opportunity commission, but his station chose to hire her anyway.

88. Also, after the deadly attack, Williams faxed a 23-page manifesto to media, saying, “Why did I do it? I put down a deposit for a gun on 6/19/15. The Church shooting in Charleston happened on 6/17/15 . . .” “What sent me over the top was the church shooting. And my hollow point bullets have the victims’ initials on them.’ ‘As for Dylann Roof? You [redacted]! You want a race war [redacted]? BRING IT THEN YOU WHITE . . . [redacted]!!!”

89. Williams’ manifesto and Twitter prove a direct nexus between Defendant Farrakhan’s explicit calls for murder at his June 24, 2015 speech in Washington, D.C., where he spoke about Dylann Roof.

90. Defendant Farrakhan includes Jews in his incitement against “the 400 year enemy.” Defendant Farrakhan has alleged that the Jewish people were responsible for the slave trade and that they conspire to control the government, the media, Hollywood, and various black individuals and organizations. Farrakhan often promotes such messages at public speeches and sermons, some of which attract thousands of followers.

91. During Part II of his 2015 Saviours’ Day keynote address at the Mosque Maryam in Chicago, Illinois, Farrakhan alleged (again) that Israel and Jews orchestrated the 9/11 attacks on the United States, claiming that “Israelis had foreknowledge of the attacks” and that Jews were warned ahead of time not to come to work that day.

92. Farrakhan then went on to speak more broadly of Israeli control of the American government, stating that Israel and Jews “don’t fear America because they control it from within.”

93. Defendant Farrakhan received a standing ovation after telling his audience “the Satanic Jews that control everything and mostly everybody, if they are your enemy, then you must be somebody.”<sup>35</sup>

94. One of Defendant Farrakhan’s largest attempts to reach new audiences was a 58-part online lecture series, started in January 2013 that lasted through February 2014. In the series, Farrakhan frequently characterized Jews as “Satanic” and promoted a wide range of anti-Semitic conspiracy theories, alleging Jewish control over government, finance, entertainment, and other sectors. The lecture series, which received an average of about 40,000 views per sermon, is part of a larger effort by the Nation of Islam’s media arm to spread its hate through a range of propaganda, including through its newspaper and various social media sites.<sup>36</sup>

95. Defendant Farrakhan has attacked Judaism as a “gutter religion” and Israel as an “outlaw” nation.<sup>37</sup>

96. According to The New York Times, Defendant Farrakhan has repeated for a national television audience his description of Adolf Hitler as “a very great man.”<sup>38</sup>

97. Defendant Farrakhan’s speeches have resulted in the deaths of police officers and law enforcement officials, Jews and Caucasians such as Plaintiff and other members of the class, and, because of his enormous and very loyal followers, continue to cause imminent fear of harm and actual harm through serious bodily injury or death to all police officers and other law

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<sup>35</sup> “Farrakhan In His Own Words,” Anti-Defamation League, March 20, 2015, accessible at: <http://www.adl.org/anti-semitism/united-states/c/farrakhan-nation-of-islam-noi-in-his-own-words.html>

<sup>36</sup> *Id.*

<sup>37</sup> “Jews Express Outrage at Farrakhan Calling Judaism ‘gutter Religion’, Israel Described As ‘outlaw’ State,” Jewish Telegraphic Agency, June 27, 1984, accessible at: <http://www.jta.org/1984/06/27/archive/jews-express-outrage-at-farrakhan-calling-judaism-gutter-religion-israel-described-as-outlaw-st>

<sup>38</sup> “Farrakhan Again Describes Hitler as a ‘Very Great Man,’” The New York Times, July 17, 1984, accessible at: <http://www.nytimes.com/1984/07/17/us/farrakhan-again-describes-hitler-as-a-very-great-man.html>

enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians. Defendants statements as set forth in the preceding paragraphs were and are widely disseminated and published not just in this District but throughout the nation and internationally. These statements were uttered and broadcast on behalf of himself and the NOI, which he leads.

**B. Defendant Nation of Islam**

98. Defendant Farrakhan's actions were taken in furtherance of himself and Defendant NOI, of which Defendant Farrakhan serves as president and its leader in general.

99. Defendant NOI was founded in Detroit, Michigan, in on July 4, 1930. It has grown into "one of the wealthiest and best-known organizations in black America," which has been fueled by "the deeply (Black Muslim) racist, anti-Semitic and anti-gay rhetoric of its leaders, including top minister [Defendant] Louis Farrakhan."<sup>39</sup>

100. Defendant NOI has firmly established its deeply racist, anti-Semitic, and anti-gay position, and has announced those positions publically through its actions and words. "While Jews remain the primary target of Farrakhan's vitriol, he is also well known for bashing gay men and lesbians, Catholics and, of course, the white devils, whom he calls "potential humans ... [who] haven't evolved yet."<sup>40</sup>

101. Defendant NOI, in furtherance of its racist and anti-Semitic views, have even associated with white supremacy groups in favor of racial separatism. "All of this has helped make him attractive to certain white supremacist groups who agree that the races must be separated. In its turn, NOI has come to view white supremacists as people who at least understand NOI's program and could therefore become allies."<sup>41</sup>

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<sup>39</sup> Nation of Islam, Southern Poverty Law Center, <https://www.splcenter.org/fighting-hate/extremist-files/group/nation-islam>

<sup>40</sup> *Id.*

<sup>41</sup> *Id.*

102. Additionally, Defendant NOI, in furtherance of its racist and anti-Semitic and anti-Christian views, have been willing to tie themselves to “authoritarian and, in many cases, violently repressive foreign leaders for the sake of furthering black and Islamic administrations worldwide. These include Libyan dictator Muammar Ghadafi, Zimbabwean leader Robert Mugabe, and the now deceased General Muhammad Zia-ul-Haq of Pakistan and Ugandan despot Idi Amin.”<sup>42</sup>

103. In furtherance of its deeply racist, anti-Semitic views, Defendant NOI has called for and incited violence, under the façade of “self-defense”. The great Dr. Martin Luther King quickly realized this—referring to Defendant NOI as “a hate group arising in our midst that would preach the doctrine of black supremacy.”<sup>43</sup>

104. In fact, Defendant NOI’s deeply racist, anti-Semitic, anti-Christian and anti-gay views and calls to violence in furtherance thereof have undeniably caused many recent explosions of violence in the name of Defendant NOI.

105. As set forth above, Johnson shot at a large group of police officers during the recent Dallas Police Shooting, killing five and injuring nine. Johnson was a member of the Defendant NOI, as confirmed through Johnson’s Facebook account. This is consistent with the Defendant Farrakhan’s calls to violence and death amongst his disciples. An article called *Dallas Shooting: Time to Hold Nation of Islam Accountable* by Ryan Mauro confirms that the Nation of Islam praised Johnson’s actions.<sup>44</sup>

106. On July 17, 2016, Gavin Eugene Long (“Long”) ambushed and shot six police officers in Baton Rouge, Louisiana. Three of Long’s victims were killed. It has been revealed that Long was a member of the Nation of Islam, as per Long’s own admission on his YouTube

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<sup>42</sup> *Id.*

<sup>43</sup> *Id.*

<sup>44</sup> available at: <http://m.clarionproject.org/analysis/dallas-shooting-time-hold-nation-islam-accountable>

channel.<sup>45</sup> Consistent with Defendant Farrakhan’s calls to violence and death among his Nation of Islam disciples, Long’s motivation behind his murders became apparent through his YouTube channel and his “manifesto,” which revealed that Long was intent on targeting police officers. Long referred to Johnson, the gunman who shot and killed five Dallas officers on July 7, 2016 as “one of us.”<sup>46</sup>

107. In 2002, Allen Muhammad and Lee Malvo carried out a shooting spree that killed 17 total persons and left an additional 10 persons injured in the Northern Virginia area. Both snipers were members of the Nation of Islam, with Lee Malvo saying, “one of the reasons for the shootings was that white people had tried to harm Louis Farrakhan, leader of the Nation of Islam.”<sup>47</sup>

108. In fact, Defendant NOI was inextricably linked to one of the most heinous, racially driven killing sprees in American history. Between the years of 1973 and 1976, four members of Defendant NOI—J.C.X. Simon, Jessie Lee Cooks, Manuel Moore, and Larry Craig Green—carried out a plan to “run all the whites out of San Francisco.”<sup>48</sup> In furtherance of this racist agenda, the four members of Defendant NOI “killed 14 people and left at least seven wounded.”<sup>49</sup> Perhaps the most heinous example of their actions was their brutal attack on Quita and Richard Hague. “They sexually assaulted Mrs. Hague then struck her repeatedly with a

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<sup>45</sup> Chuck Ross, *Baton Rouge Shooter Gavin Eugene Long Was Nation of Islam Member, Railed Against ‘Crackers’ On YouTube Channel*, Daily Caller, July 17, 2016, available at: <http://dailycaller.com/2016/07/17/baton-rouge-shooter-gavin-eugene-long-was-nation-of-islam-member-railed-against-crackers-on-youtube-channel-video/>

<sup>46</sup> Brian McBride, *Investigators Scour Baton Rouge Gunman’s Social Media as Motive Remains Unknown*, ABC News, July 18, 2016, available at <http://abcnews.go.com/US/investigators-scout-baton-rouge-gunmans-social-media-motive/story?id=40657759>

<sup>47</sup> Daniel Pipes, *The Beltway Snipers’ Motives*, August 19, 2003, available at <http://www.danielpipes.org/blog/2003/08/the-beltway-snipers-motives>

<sup>48</sup> Lloys Billingsley, *Remembering a Racist, Black Muslim Murder Spree*, Front Page Mag, March 18, 2015, available at <http://www.frontpagemag.com/fpm/253336/remembering-racist-black-muslim-murder-spree-lloyd-billingsley>

<sup>49</sup> *Id.*

machete, ‘which nearly decapitated her.’ The attackers hacked at Mr. Hague and left him for dead, but he survived.”<sup>50</sup> It is important to note that the other Defendants in this suit have not generally even criticized the actions of Defendant Farrakhan and the Nation of Islam, as they agree with them or support them to further their political ambitions and agendas. This included but is not limited to Defendants Obama and Clinton.

**C. Defendants National Action Network and Al Sharpton**

109. Defendant Al Sharpton (“Defendant Sharpton”) is a supposed political activist against racial prejudice and injustice.<sup>51</sup> Defendant Sharpton founded Defendant National Action Network (“Defendant NAN”) in 1991.<sup>52</sup>

110. Defendant Sharpton has persistently for many years made statements and committed acts to incite and inflame the public, especially minority communities, to commit attacks of violence, death, or serious bodily injury against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians

111. On April 10, 2015, Defendant Sharpton pushed the idea of using “civil rights” laws to outlaw local police departments and create a “nationalized” police force. Defendant Sharpton announced in 2015 that Defendant NAN would be taking up the cause of having the U.S. Department of Justice taking over policing all across the country. Defendant Sharpton stated “That’s why we’re going to do this march from here to Washington. We need the Justice Department to step in and take over policing in this country.”<sup>53</sup>

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<sup>50</sup> *Id.*

<sup>51</sup> Al Sharpton, BIO, <http://www.biography.com/people/al-sharpton-207640>

<sup>52</sup> National Action Network, <http://nationalactionnetwork.net/about/>

<sup>53</sup> Brian Hayes, "Al Sharpton Wants to ‘End’ Local Policing, Demands NATIONALIZED Police Force," Top Right News, May 1, 2015, accessible at: <http://toprightnews.com/al-sharpton-wants-to-end-local-policing-demands-nationalized-police-force>

112. Since the deaths of Michael Brown and Eric Garner, Defendant Sharpton and his agents have travelled across the mid-west and northeast to hold rallies and protest marches inciting the blacks and others to undertake attacks causing death or serious bodily injury or death against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians.<sup>54</sup>

113. Defendant Sharpton lead incendiary and inflammatory rallies in Ferguson, Missouri, early on in the developing violence and incited the looting, arson, destruction of property, assaults on police, threatening mobs, and violence.

114. In one of Defendant Sharpton's rallies that occurred on December 15, 2014 in New York City, marchers were chanting death threats to the police: "**What do we want? Dead cops! When do we want it! Now!**"<sup>55</sup> The protesters event assaulted two NYPD officers and blocked traffic on the Brooklyn Bridge.<sup>56</sup>

115. On December 20, 2014, only five days after the hateful protest involving death threats to the police, Brinsley executed two New York City police officers as they ate lunch together in their police car, took place. As stated previously, Brinsley expressed that the police shootings of Michael Brown and Eric Garner were the reason he planned to murder the two police officers.<sup>57</sup>

116. In a similar protest, a march organized by Defendant NAN again chanted the oft-heard slogan (and implied threat), "No Justice, No Peace" with marchers demanding that federal laws be enacted to curb local and state police agencies use of force rules.

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<sup>54</sup> Video posted at: Geoffrey Grider, "Al Sharpton Incited Anti-Police Violence Now Seeks Police Protection, December 22, 2014, accessible at: <http://www.nowtheendbegins.com/blog/?p=29363>

<sup>55</sup> "Obama, Holder, Sharpton Stoke Flames, Ferguson Officers Shot," Breitbart, March 12, 2015, *supra*.

<sup>56</sup> Warner Todd Huston, "Al Sharpton Leads March in DC as NYC Protesters Chant: 'What Do We Want? Dead Cops!,'" Breitbart, December 13, 2014, accessible at: <http://www.breitbart.com/big-government/2014/12/13/al-sharpton-leads-thousands-in-saturday-march-on-washington-dc/>

<sup>57</sup> "Obama, Holder, Sharpton Stoke Flames, Ferguson Officers Shot," Breitbart, March 12, 2015, *supra*.

117. Once the thousands of marchers reached the grounds outside the New York Capitol, Sharpton warned Congress that he and his supporters would not be ignored. “You thought you’d sweep it under the rug. You thought there’d be no limelight,” Sharpton said. “We are going to keep the light on Michael Brown, on Eric Garner, on Tamir Rice, on all of these victims because the only way—I’m sorry, I come out of the ‘hood—the only way you make roaches run, you got to cut the light on.”<sup>58</sup>

118. Defendant Sharpton’s incitement of violence and rioting has brought about further discord and hatred in America. Defendant Sharpton has been a prime contributor of civil unrest and violence in predominantly black urban communities.

119. Defendant Sharpton's actions and statements call for anarchy and encourage blacks to ignore, disrespect, and engage law enforcement officials, namely Caucasian officers, with violence and lethal force.<sup>59</sup>

120. Defendant Sharpton's statements were intended to cause violence and/or death to police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians. Defendant Sharpton is a friend of and close confidant

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<sup>58</sup> “Al Sharpton Leads March in DC as NYC Protesters Chant: ‘What Do We Want? Dead Cops!’” Breitbart, December 13, 2014, *supra*. Rep. Peter T. King (R-N.Y.) and former New York governor George Pataki have blamed Sharpton for using rhetoric that they said fostered an anti-police environment. Former New York City police commissioner Bernard Kerik said Sharpton and others had “blood on their hands.” Sandhya Somashekhar and Wesley Lowery, “Sharpton faces criticism after NYC officers’ deaths,” The Washington Post, December 23, 2014, accessible at:

[http://www.washingtonpost.com/politics/sharpton-faces-criticism-after-nyc-officers-deaths/2014/12/23/4ddefd4-8ab6-11e4-8ff4-fb93129c9c8b\\_story.html](http://www.washingtonpost.com/politics/sharpton-faces-criticism-after-nyc-officers-deaths/2014/12/23/4ddefd4-8ab6-11e4-8ff4-fb93129c9c8b_story.html)

<sup>59</sup> <https://www.change.org/p/patrick-murphy-remove-al-sharpton-from-white-house-advisory-team-and-conduct-a-federal-investigation-to-charge-mr-sharpton-with-inciting-riots-promoting-violence-against-law-enforcement-and-encouraging-civil-unrest-in-urban-communities-across-america>. Former New York City mayor Giuliani said himself that Defendant Sharpton has been to the white House as many as 85 times, and he blamed the “civil rights leader” for instigating riots and inflaming tensions between police and the public. Giuliani also said Obama “hasn’t made strong comments” about the deaths of the New York police officers. He further stated that “If you would like to have a poster boy for hating the police, it’s Al Sharpton. You make Al Sharpton a close adviser, you’re going to turn the police in America against you.” <http://www.ibtimes.com/obama-al-sharpton-relationship-shows-president-anti-cop-rudy-giuliani-1768276>.

of Defendant Obama and is thus a frequent visitor to the White House, where he has and continues to participate in meetings designed for further a race war for their join political missions and agendas. Defendant Sharpton is also a close friend, confidant, and co-conspirator with Defendant Farrakhan and the other Defendants to the acts as pled herein.

**D. Defendants Black Lives Matter, Opal Tometi, Patrisse Cullors, Alicia Garza, Rashad Turner, Johnetta Elzie, and Deray Mckesson**

121. Defendant Black Lives Matter (“Defendant BLM”) is a so called political ‘project’ that was launched in the wake of the murder of Trayvon Martin in order to supposedly combat implicit bias and anti-black racism and to protect and affirm the beauty and dignity of all black lives.<sup>60</sup>

122. While Defendant BLM falsely claims to combat anti-black racism, the movement has in fact incited and committed further violence, severe bodily injury and death against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians. Defendant BLM is in fact a violent and revolutionary criminal gang.

123. Dominique Alexander, who helped organize the July 7, 2016 “protest” that led to the Dallas Police Shooting, was recently sentenced to five years in prison for probation violations.<sup>61</sup>

124. Defendant BLM was created in response to the false propaganda by Defendants Obama, Holder, Sharpton, Farrakhan and others deceptively and fraudulently convincing blacks that police officers and other law enforcement personnel are targeting them and that they are being disproportionately arrested and prosecuted.

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<sup>60</sup> “BAJI’s Staff,” Black Alliance for Just Immigration, <http://www.blackalliance.org/about/bajistaff/>

<sup>61</sup> Naheed Rajwani, *Judge Extends Dallas Activist Dominique Alexander’s Prison Sentence to 5 Years*, Dallas News, September 9, 2016, available at: <http://www.dallasnews.com/news/local-news/20160909-judge-extends-dallas-activist-dominique-alexander-s-prison-sentence-to-5-years.ece>

125. Defendant BLM was created by Defendants Alicia Garza (“Defendant Garza”), Patrisse Cullors (“Defendant Cullors”), and Opal Tometi (“Defendant Tometi”). Defendants Rashad Turner (“Defendant Turner”), Johnetta Elzie (“Defendant Elzie”) and DeRay McKesson (“Defendant Mckesson”) are all leaders of Defendant BLM. (collectively “BLM Defendants” unless individually named)

126. Defendant BLM’s calls for and incitement of violence of death against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians have undeniably led to explosions of violence as a direct result.

127. Most recently, on September 13, 2016, Marc LaQuon Payne (“Payne”) intentionally drove his car into a group of three Phoenix police officers, with the specific intent to kill and/or cause serious bodily harm to those officers.<sup>62</sup> Indeed two of the officers suffered serious injuries, with one having sustained a broken leg and another being launched into the air.<sup>63</sup>

128. Payne is associated with Defendant BLM, as he was part of a recent Black Lives Matter protest in Phoenix that shut down a highway.<sup>64</sup>

129. In response to the incitement to violence of the Defendants, on September 2, 2015, Carlos Anthony Hollis, (“Hollis”) under the Twitter name of “black guy in avi,” broadcast a message on Twitter saying: “IM NOT GONNA STAND FOR THIS NO. MORE. TONIGHT WE PURGE! KILL ALL THE WHITE PPL IN THE TOWN OF LAPLATA #BlackLivesMatter.”

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<sup>62</sup> *Attempted Murder of Three Police Officers in Phoenix*, HotAir, September 14, 2016, available at: <http://hotair.com/archives/2016/09/14/attempted-murder-three-police-officers-phoenix/>

<sup>63</sup> *Id.*

<sup>64</sup> *Id.*

130. Hollis, the Maryland man who called for the killing of white people in his town of La Plata, announced that he would be killing white people in La Plata. In other words, in the legal meaning of incitement, Hollis announced that he was heading out to kill white people and urged others to come join him in this imminent violence.

131. Hollis was arrested the same day and charged with the issuance of deadly threats against local citizens.

132. On July 7, 2016, Lakeem Keon Scott (“Scott”) shot at passing cars along a Tennessee highway, killing one woman and wounding three others, including a police officer.<sup>65</sup> Witnesses heard Scott yelling “police suck! Black lives matter!” as he opened fire.<sup>66</sup> Police later on found “Black Lives Matter” materials inside of Scott’s home.<sup>67</sup> All of Scott’s victims were Caucasian.<sup>68</sup>

133. On July 29, 2016 17-year old Marquell Rentas (“Rentas”) attempted to shoot and kill four police officers in Columbia, Pennsylvania while his 18-year old cousin, Trenton Nace (“Nace”), aided him.<sup>69</sup> Rentas left no question as to his motivation, telling police “I was shooting at you, F-you, police.”<sup>70</sup> Rentas’ mother blames Black Lives Matter for indoctrinating her child and inciting violence, saying. “[Rentas and Nace] are in jail for doing what Black Lives Matter

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<sup>65</sup> *Witness heard Bristol gunman yelling, ‘Police suck! Black lives matter!’ as he opened fire*, CNN Wire, July 8, 2016, available at: <http://wtvr.com/2016/07/08/bristol-gunner-lakeem-keon-scott-yelled-police-suck-black-lives-matter/>

<sup>66</sup> *Id.*

<sup>67</sup> *Id.*

<sup>68</sup> Mark Heim, *Tennessee Highway Gunman Kills 1, Injures 3, Motivated by Police Shootings, Authorities Said*, AL, July 8, 2016, available at:

[http://www.al.com/news/index.ssf/2016/07/tennessee\\_highway\\_gunner\\_motiv.html](http://www.al.com/news/index.ssf/2016/07/tennessee_highway_gunner_motiv.html)

<sup>69</sup> Joe Elias, *Boy, 17, Charged with Trying to Shoot and Kill Four Lancaster County Police Officers*, Penn Live, July 30, 2016, available at:

[http://www.pennlive.com/news/2016/07/boy\\_17\\_charged\\_with\\_trying\\_to.html](http://www.pennlive.com/news/2016/07/boy_17_charged_with_trying_to.html)

<sup>70</sup> *Id.*

wanted them to do: shoot at cops. The truth is that these are two punk kids following the orders of an irresponsible organization and now they're going to pay for it.”<sup>71</sup>

134. In September 2015, Joseph Thomas Johnson-Shanks (“Shanks”) shot and killed Trooper Joseph Cameron Ponder after leading Kentucky State Police on a high speed chase.<sup>72</sup> Shanks’ Facebook account has conclusively shown that Shanks was an advocate of Black Lives Matter, showing Shanks’ presence at protests and at Michael Brown’s funeral.

135. The term “purge” has been adopted by the Black Lives Matter movement, referring to a recent movie “The Purge” depicting a society in which on one night a year all laws are suspended and unlimited violence, looting, murder, assault, rape, etc. is allowed.

136. The term “Purge” within the Black Lives Matter movement specifically refers to lawless rioting, arson, murder, assault, looting, and rape carried out as perceived revenge against anyone who has more, especially Jews or Caucasians, as a routine part of the movement.

137. In Ferguson, Missouri, after violent assaults by a repeat juvenile delinquent Michael Brown upon an elderly shopkeeper and then upon police officer on August 9, 2014, the BLM Defendants incited, instigated, and orchestrated violence, arson, looting, assault, and rioting.

138. Residents of Ferguson, Missouri, reported that most of the violence, arson, looting, assaults on police, and threatening behavior was committed by outsiders who came to Ferguson from all over the United States, as far away as San Francisco and New York City. In fact, records show that many of Defendant BLM’s Ferguson “protesters” were actually paid to be

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<sup>71</sup> PA Mom Blames Black Lives Matter for Son Shooting Police, RT, August 3, 2016, available at: <https://www.rt.com/usa/354424-mom-blames-black-lives-matter-shooting-police/>

<sup>72</sup> Nina Golgowski, Suspect in Kentucky Trooper’s Shooting Death Was a ‘Black Lives Matter’ Advocate in St. Louis, Facebook Shows, NY Daily News, September 14, 2015, available at: <http://www.nydailynews.com/news/national/suspect-trooper-death-black-lives-matter-backer-article-1.2360320>

there by Missourians Organizing for Reform and Empowerment, a branch of ACORN who has supported Defendant BLM.<sup>73</sup>

139. On August 29, 2015, just a few days after Shannon J. Miles executed Deputy Darren Goforth, a march was led under the Black Lives Matter movement in St. Paul, Minnesota.

140. During the march, protesters chanted in unison, “**Pigs in a blanket, fry em’ like bacon.**” The chant was clearly meant to promote and cause severe bodily injury or death among innocent police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians, who were, ironically, at the march to help protect the protestors’ free speech.<sup>74</sup>

141. Milwaukee County Sheriff David Clarke has openly expressed that Black Lives Matter is a race baiting movement intended to create more division and segregation.<sup>75</sup>

142. In an appearance on CNN, Sheriff Clarke pointed out that Black Lives Matter activists are directly tied to the brutal murder of Harris County, Texas deputy Darren Goforth.<sup>76</sup>

143. Sheriff Clarke has described the Black Lives Matter movement as “vile, vulgar, and slimy.”

144. In response, Sheriff Clarke and other African-American members of law enforcement who have had the courage to speak out against the hateful message of the BLM

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<sup>73</sup> Jessica Chasmar, *Hired Black Lives Matter Protesters Start #CutTheCheck After Being Stiffed by ACORN Successor Group*, Washington Times, May 19, 2015, available at <http://www.washingtontimes.com/news/2015/may/19/hired-black-lives-matter-protesters-start-cutthech/>

<sup>74</sup> Bill Hudson, ”Black Lives Matter Chant Called ‘Disgusting’ By Police Leader,” CBS Minnesota, August 30, 2015, accessible at: <http://minnesota.cbslocal.com/2015/08/30/black-lives-matter-chant-called-disgusting-by-police-leader/> ; <https://www.youtube.com/watch?v=9xNxoeqf0Ws>

<sup>75</sup> “Sheriff Clarke: Black Lives Matter Is A ’Vulgar, Vile, Vicious, Slimy Movement,’” Infowars.com, September 1, 2015, *supra*.

<sup>76</sup> *Id.*

Defendants have been unfairly labeled by the BLM Defendants as “sellout” and an “Uncle Tom.”<sup>77</sup>

145. For example, members of the #FYF911 or #FukYoFlag and #blackLivesMatter movements called for the lynching and hanging of white people and cops.

146. The BLM Defendants have encouraged others on a radio show night to “turn the tide” and kill white people and cops to send a message about the killing of black people in America.<sup>78</sup>

147. Despite the fact that the BLM Defendants hold themselves out as fighting injustice on behalf of all African Americans, many African Americans have seen through the BLM Defendants’ façade and have instead joined the All Lives Matter movement.<sup>79</sup>

148. A 27-year-old black Marine Michael Whaley explains in a video spreading nation-wide and rebroadcast on Fox news:<sup>80</sup>

This Black Lives Matter movement only promotes racism and now they are encouraging black people to go and kill white people because they want white people to feel what we felt 400 years ago. All Lives Matter. That police officer that got killed by that black man because that black man listened to what y'all were saying about going out and killing white people. That police officer's life mattered. That nine-year old girl in Ferguson, Missouri, that got shot in the head while she was doing her homework, in a drive-by shooting, that none of y'all protested. Her life mattered. ... The reason that I don't got a lot of support is, I'm gonna tell you the God honest truth, the reason that I don't got a lot of support is because black people can't accept the truth about their-selves.

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<sup>77</sup> Chuck Ross, Black Sheriff Responds To ‘Uncle Tom’ Taunt By New York Daily News Columnist And Black Lives Matter Activist, Daily Caller, October 27, 2015, available at: <http://dailycaller.com/2015/10/27/black-sheriff-responds-to-uncle-tom-taunt-by-new-york-daily-news-columnist-and-black-lives-matter-activist/#ixzz4JnWtmS5j>

<sup>78</sup> Lana Shadwick, “Black Activists Call for Lynching and Hanging of White People and Cops,” Breitbart, August 28, 2015, accessible at: <http://www.breitbart.com/texas/2015/08/28/black-activists-called-for-lynching-and-hanging-of-white-people-and-cops/>

<sup>79</sup> [www.alllivematter.com](http://www.alllivematter.com)

<sup>80</sup> <http://video.foxnews.com/v/4460311780001/black-americans-fight-back-against-black-lives-matter-/?#sp=show-clips>

Black people admitting to the truth is like they're snitching on their-selves. And black people have this no-snitching rule. They're gonna deny till they die.

Y'all teaching black people to hate white people, and then you're encouraging black people to throw their lives down the drain by taking away somebody else's life. Sad. I'm gonna pray for y'all.

149. Michael Whaley explained further on Fox News on September 2, 2015, that

Black on black crime happens every day. So if a black person goes and kills another black person, they gonna deny till they die. They're not gonna admit the truth. Some people don't like admitting the truth because they don't like that. Like, it hurts me to say right there, it hurts me as a black man to say right here I have to tell the truth about my own people, but I love my own people.

150. On August 29, 2015, the mixed-race Guiding Light Church led a "Restoring Unity Rally" and march in Birmingham, Alabama. On September 1, 2015, the mostly-black choir of the church performed a hymn 'All Lives Matter' calling for unity and forgiveness by God's grace.<sup>81</sup>

#### E. **Defendants New Black Panther Party and Malik Zulu Shabazz**

151. Defendant NBPP became active in or around the year 1990.<sup>82</sup> In 1994, Khalid Abdul Muhammad ("Muhammad") became actively involved with Defendant NBPP.<sup>83</sup> Muhammad had previously been the personal assistant to Defendant Farrakhan, but contentiously left after he was demoted from his position as national spokesman for Defendant NOI after giving a speech where he called Jews "bloodsuckers" and called for the murder of white South Africans who refused to leave South Africa.<sup>84</sup>

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<sup>81</sup> <http://video.foxnews.com/v/4456810813001/the-guiding-light-church-performs-all-lives-matter/?#sp=show-clips>

<sup>82</sup> Southern Poverty Law Center, *Extremist Files: New Black Panther Party*

<sup>83</sup> *Id.*

<sup>84</sup> *Id.*

152. From the time that Muhammad joined Defendant NBPP, there existed a contentious relationship between Defendants NOI and NBPP, whereby each hate group fought the other for recruits, akin to other terrorist organizations such as Al-Qaeda and ISIS. In fact, Muhammad was shot and injured in May, 1994 by a former Nation of Islam member.<sup>85</sup>

153. Defendant NBPP has deep and clearly established anti-Semitic, anti-Christian, and anti-Caucasian views, and Defendant NBPP routinely calls for the murder of individuals fitting those descriptions.

154. As described in the preceding paragraphs of this Amended Complaint, Johnson, who perpetrated the Dallas Police Shooting, was a member of Defendant NBPP, as confirmed through his social media posts.<sup>86</sup> Johnson carried out the Dallas Police Shooting under the direction of Defendant NBPP and in furtherance of the hateful and violent dogmatic beliefs of Defendant NBPP.

155. Defendant NBPP has threatened Plaintiff Klayman's life and the life of his family after Plaintiff Klayman filed the original complaint, as discussed previously in the Amended Complaint. Plaintiff received a call from Defendant New Black Panther Party acting in concert with the other Defendants, threatening, "you cracker...you broke with the Black Panthers and the black lives matter and all black people in this country. God probably alone. You should be worried about the [safety of] you[r] whole goddamn family." These threats against Plaintiff Klayman and similar threats against Plaintiff Pennie have been reported to the Federal Bureau of Investigation as they are criminal in nature against an officer of this Court and a party and legal counsel, as well as a Dallas police officer.

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<sup>85</sup> *Id.*

<sup>86</sup> Bob Price, *Confirmed: Dallas Shooter Was Member of Houston New Black Panther Party*, Breitbart, July 8, 2016, available at: <http://www.breitbart.com/texas/2016/07/08/confirmed-dallas-shooter-member-houston-new-black-panther-party/>

156. For instance, former NBPP chairman Muhammad has been quoted as saying

Our lessons talk about the bloodsuckers of the poor.... . It's that old no-good Jew, that old imposter Jew, that old hooked-nose, bagel-eating, lox-eating, Johnny-come-lately, perpetrating-a-fraud, just-crawled-out-of-the-caves-and-hills-of-Europe, so-called damn Jew ... and I feel everything I'm saying up here is kosher.<sup>87</sup>

157. Defendant NBPP has taken a stance so radical and violent that even the original Black Panther Party has decried Defendant NBPP for being a hateful and unconstructive group. Bobby Seale, one of the founders of the original Panthers, calls Defendant NBPP, “a black racist hate group.”<sup>88</sup>

158. In 2001, Defendant Malik Zulu Shabazz (“Defendant Shabazz”) took over as chairman of Defendant NBPP after Muhammad passed away.<sup>89</sup> However, Defendant Shabazz shares the same hateful and violent beliefs as his predecessor and mentor, Muhammad. On April 20, 2002, Defendant Shabazz said, “Kill every goddamn Zionist in Israel! Goddamn little babies, goddamn old ladies! Blow up Zionist supermarkets!”<sup>90</sup>

159. In March 2012, a Florida leader of Defendant NBPP placed a \$10,000 bounty on George Zimmerman, who had killed Trayvon Martin. His rationalization was, “An eye for an eye, a tooth for a tooth.”<sup>91</sup>

160. In January, 2009, the Philadelphia leader of Defendant NBPP, King Samir Shabazz said:

I hate white people. All of them. Every last iota of a cracker, I hate it. We didn't come out here to play today. There's too much serious business going on in the black community to be out here sliding through South Street with white, dirty, cracker whore bitches on our arms, and we call ourselves black men. ... What the hell is

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<sup>87</sup> Southern Poverty Law Center, *supra* note 77.

<sup>88</sup> *Id.*

<sup>89</sup> *Id.*

<sup>90</sup> *Id.*

<sup>91</sup> *Id.*

wrong with you black man? You at a doomsday with a white girl on your damn arm. We keep begging white people for freedom! No wonder we not free! Your enemy cannot make you free, fool! You want freedom? You going to have to kill some crackers! You going to have to kill some of their babies!

161. Unlike his predecessor, Defendant Shabazz has been working to rekindle Defendant NBPP's relationship with Defendant Farrakhan and Defendant NOI. As of January 2010, Defendant Shabazz was expressing approval of Defendant NOI and reiterating his commitment to support its efforts.<sup>92</sup> This is evidence that Johnson carried out the Dallas Police Shooting at the direction of both Defendant NOI and Defendant NBPP.

**F. Defendant George Soros**

162. Defendant Soros is a billionaire financier who has funded numerous radical, left wing groups, including "ACORN, Apollo Alliance, National Council of La Raza, Tides Foundation, Huffington Post, Southern Poverty Law Center, Soujourners, People for the American Way, Planned Parenthood, and the National Organization for Women." Defendant Soros is also a financial backer of "Media Matters for America", a leftist, radical publication.<sup>93</sup>

163. Importantly, Defendant Soros is widely known as one of the primary financial backers of the Black Lives Matter movement. Defendant Soros has contributed at least \$650,000 directly in furtherance of the Black Lives Matter movement's calls to violence and death.<sup>94</sup>

164. Defendant McKesson, a leader of Defendant BLM, even lives in the home of Robin Wood, who is a board members of Defendant Soros' Open Society Institute.<sup>95</sup>

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<sup>92</sup> *Id.*

<sup>93</sup> Human Events, Top 10 Reasons George Soros is Dangerous, <http://humanevents.com/2011/04/02/top-10-reasons-george-soros-is-dangerous/>

<sup>94</sup> BrietBart, Hacked Soros Memo: \$650,000 to Black Lives Matter, <http://www.breitbart.com/big-government/2016/08/16/hacked-soros-memo-baltimore-riots-provide-unique-opportunity-reform-police/>

<sup>95</sup> Cozy: BLM Leader Lives in Home Owned by Soros' Open Society Board Member, <http://www.theamericanmirror.com/blacklivesmatter-leader-deray-lives-home-owned-by-soros-connected/>

165. Defendant Soros has given at least \$33 million in one year to support various groups, such as Black Lives Matters, who are serving to further the on-going racial war by inciting racial violence against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians.<sup>96</sup>

166. Defendants Soros has gone so far as to pay over 80 individuals and organizations to “protest” during the civil unrest that occurred in Ferguson, Missouri, in furtherance of the violent and hateful incitements to violence perpetrated by his co-Defendants.<sup>97</sup>

167. Defendant Soros, who himself is of Jewish origin, is admittedly anti-Semitic.<sup>98</sup> Defendant Soros and his father, Theodore, were both Nazi sympathizers and collaborators. In fact, “Soros betrayed other Jews and helped steal their property and send them to their tragic deaths to spare himself.”<sup>99</sup>

168. Defendant Soros is the driving force and primary financial backer of the Black Lives Matter movement, and other related groups. Without Defendant Soros’ financial backing, Black Lives Matter and other related groups as pled herein would be unable to carry out their war against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians. Thus, Soros has through his own actions effectively paid for the severe physical injury and death of law enforcement as pled herein and incited violence against the Plaintiffs and those similarly situated.

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<sup>96</sup> Washington Times, George Soros Funds Ferguson Protests, Hopes to Spur Civil Action, <http://www.washingtontimes.com/news/2015/jan/14/george-soros-funds-ferguson-protests-hopes-to-spur/>

<sup>97</sup> Paul Joseph Watson, Leaked List Shows Ferguson Protesters Paid By Soros Front Group, InfoWars, May 19, 2016, available at: <http://www.infowars.com/leaked-list-shows-ferguson-protesters-paid-by-soros-front-group/>

<sup>98</sup> George Soros, <http://www.jewishvirtuallibrary.org/jsource/biography/Soros.html>

<sup>99</sup> George Soros Says He Feels No Remorse For Collaborating With Nazis During WWII to Send His Fellow Jews to the Death Camps, Steal Their Property, <http://itmakesessenseblog.com/2011/01/28/george-soros-says-he-feels-no-remorse-for-collaborating-with-nazis-during-wwii-to-send-his-fellow-jews-to-the-death-camps-steal-their-property/>

**G. Defendant President Barack Hussein Obama**

169. Defendant Obama has used his position of great authority to ratify, endorse, embrace, and condone the violence against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians perpetrated by his co-Defendants, as set forth previously in this Amended Complaint. Indeed, when someone as influential as the President of the United States of America affirmatively acts to perpetrate, incite, condone, ratify and further propagate the violent and hateful dogmas guiding the BLM Defendants, Defendant NOI, and Defendant NBPP, as well as the other Defendants, the predictable result is the explosion of violence against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians, as set forth previously.

170. Revealing the knowing, willful, and intentional purpose of the Defendants' concerted actions, on October 30, 2008, then candidate Defendant Obama roared to an excited crowd of his supporters: "We are five days away from fundamentally transforming America."

171. By definition, to fundamentally transform an entire society, requires replacing the old society with a new version of society. To effect this, Defendant Obama utilized the strategy to "divide and conquer," by furthering, in concert with the other Defendants, as set forth below, a race war pitting blacks against whites, furthering the mission and credo of Muslims and Black Muslims such as Defendant Farrakhan and others against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians.

172. Defendant Obama almost immediately at the start of the Obama administration to undermine the nation's police officers when on July 16, 2009, Harvard University professor

Henry Louis Gates, Jr., was arrested at his Cambridge, Massachusetts home by a local police officer responding to a neighbor's 911 call of men breaking and entering the residence.

173. Ignoring that the policeman was called by a report from the neighbors that a man was breaking in (Gates had been absent for a long time) Defendant Obama stoked racial animosity by accusing the police of acting stupidly – after admitting he did not know what happened.

174. Defendant Obama fueled incited discord by stating in his frequent and persistent theme "that there's a long history in this country of African Americans and Latinos being stopped by law enforcement disproportionately."

175. Defendant Obama started anti-police rhetoric when Michael Brown was shot while attacking a police officer in Ferguson, Missouri. Defendant Obama saw this as another opportunity to stir up major racial tensions and hatred for police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians.

176. Defendant Obama turned a defensive shooting into a national crisis. Defendant Obama was quickly aided by Defendant Holder and Defendant Sharpton in raising racial tensions and hatred for police in Ferguson, St. Louis, and eventually nationwide.

177. When a grand jury declined to indict the police officer that shot Michael Brown, rioting commenced and Defendant Obama did not try to stop the riots.<sup>100</sup>

178. Defendant Obama has conspired with all Defendants and others to incite violence, looting, arson, assault against law enforcement and helpless communities with the purpose of

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<sup>100</sup> Ben Shapiro, "Obama, Holder, Sharpton Stoke Flames, Ferguson Officers Shot," Breitbart, March 12, 2015, accessible at: <http://www.breitbart.com/big-government/2015/03/12/obama-holder-sharpton-stoke-flames-ferguson-officers-shot/>

making a new “fundamentally transformed America” appear preferable to the crime waves and chaos they themselves are creating.

179. Defendant Obama has conspired with, encouraged, engaged in joint planning with, and developed strategies, plans, and courses of action with parties responsible for carrying out acts of deadly violence against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians. He has done so acting in concert with the other Defendants.

180. For instance, Defendant Sharpton had visited with Defendant Obama seventy-three (73) times in the White House as of February 27, 2015.<sup>101</sup> His visit in February 2015 was announced as

The main topic discussed at the summit, according to the White house, was the presidential task force formed in response to violent clashes with police in Ferguson, Missouri, and New York sparked by the killings of Michael Brown and Eric Garner. ‘The president highlighted the upcoming release of the report by the Task Force on 21st Century Policing, and emphasized the work of the Task Force leading to the report’s creation,’ said the news release.

181. As reported by a former top deputy of the Defendant Farrakhan, Dr. Vibert White Jr., Defendant Obama’s ties to the black nationalist movement in Chicago run “*DEEP*,” and that for many years, Defendants Farrakhan and Obama have had “an open line between them” to discuss policy and strategy, either directly or through intermediaries.<sup>102</sup>

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<sup>101</sup> Snejana Farberov, “Home is where the POTUS is: Al Sharpton returns to White House ‘for his 73RD visit’ with Obama to discuss problems facing minorities,” *The Daily Mail*, February 27, 2015, accessible at: <http://www.dailymail.co.uk/news/article-2973067/Al-Sharpton-returns-White-House-73RD-visit-Obama-discuss-problems-facing-minorities.html#ixzz3mOt6XqXN>

<sup>102</sup> “Obama-Farrakhan Ties Are Close, Ex-Aide Says,” *Newsmax*, November 3, 2008, accessible at: <http://www.newsmax.com/InsideCover/farrakhan-obama-islam/2008/11/03/id/326298/> Dr. Vibert White Jr., who spent most of his adult life as a member and ultimately top officer of the Nation of Islam, said: “Remember that for years, if you were a politician in Chicago, you had to have some type of relationship with Louis Farrakhan. You had to. If you didn’t, you would be ostracized out of black Chicago.” *Id.* white further stated

182. Defendant Farrakhan endorsed Defendant Obama in a videotaped speech to his followers at his Mosque in Chicago in February. “You are the instruments that God is gonna use to bring about universal change, and that is why Barack has captured the youth,” Farrakhan said. He told the crowd that Obama was the new “messiah.”<sup>103</sup>

183. Moreover, on September 17, 2015, the BLM Defendants and Campaign Zero met in the White House with Defendant Obama’s primary adviser, aide, and implementer Valerie Jarrett, who is an Iranian Shia anti-Semitic Muslim, and other White House officials.<sup>104</sup> According to news reports, participants included Defendants Mckesson and Elzie.

184. The topic of the White House meeting with Defendant BLM and similar groups was mutual plans for changing official government policies about police officers and law enforcement.

185. Immediately after the Dallas Police Shooting, in July, 2016, Defendant Obama met again with the Defendant BLM at the White House. Present at the meeting was Defendant Mckesson. At the conclusion of the meeting, Defendant Obama stated, “[w]e’re not at a point yet where communities of color feel confident that their police departments are serving them with dignity and respect and equality.”<sup>105</sup> This statement was made to implicitly blame law enforcement officers for the Dallas Police Shooting, instead of holding the true culprits—his co-Defendants—responsible.

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that Obama was very much a “part of the Chicago scene” where Farrakhan, Jesse Jackson, the Rev. Jeremiah Wright Jr. and radicals would go to each other’s events and support each other’s causes. Only after Hillary Clinton called him out for being a beneficiary of Farrakhan’s support did Obama “denounce” Farrakhan’s comments, but he DIDN’T denounce the man. *Id.*

<sup>103</sup> *Id.*

<sup>104</sup> Darren Sands, BuzzFeed, September 17, 2015, accessible at:  
<http://www.buzzfeed.com/darrensands/black-lives-matter-activists-meet-with-white-house-officials#.utj953aVw>

<sup>105</sup> Theodore Schleifer, Allie Malloy, *Black Lives Matter Activists Join Obama at Forum on Policing*, CNN, July 14, 2016, available at: <http://www.cnn.com/2016/07/13/politics/obama-black-lives-matter-meeting/>

186. Defendant Obama's acts of inviting his co-Defendants, such as Defendant Sharpton and the BLM Defendants, to the White House serves to legitimize, endorse, ratify and further the hateful and violent doctrines that these parties advocate and is a direct indication of Defendant Obama's attempts to help perpetrate, incite, condone, ratify and further propagate the racist actions of his co-Defendants' actions, resulting in threats and severe bodily injury or death to law enforcement and others as pled herein.

187. Defendant Obama, in furtherance of his "fundamentally transformed America," has made numerous statements whereby he has attempted to stoke the flames of racial divide and cast blame on law enforcement officers.

188. On July 7, 2016, Defendant Obama accused the U.S. legal system -- presumably including this Court -- of a conspiracy to kill Black men. In his statement he said:

"What's clear is that these fatal shootings **are not isolated incidents**. They are symptomatic of the broader challenges within our criminal justice system, the racial disparities that appear across the system year after year, and the resulting lack of trust that exists between law enforcement and too many of the communities they serve."<sup>106</sup>

189. Clearly, the accusation that shootings "are not an isolated incident" is an incitement claiming that there is a knowing, intentional related and connected **conspiracy** -- "not isolated incidents" -- to intentionally murder Black people.

190. In July 2016, Defendant Obama compared the Black Lives Matter movement to the Abolition Movement.<sup>107</sup>

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<sup>106</sup> Leonard Greene, "President Obama gives voice to police brutality victims after Alton Sterling, Philando Castile shootings," **New York Daily News**, accessible at: <http://www.nydailynews.com/news/politics/president-obama-voice-police-brutality-victims-article-1.2703404> (emphasis added).

<sup>107</sup> Tommy Christopher, *President Obama Defends Black Lives Matter By Comparing Them to Abolition Movement*, Mediaite, July 10, 2016, available at: <http://www.mediaite.com/tv/president-obama-defends-black-lives-matter-by-comparing-them-to-abolition-movement/>

191. In an interview with the Undefeated, Defendant Obama again expressly supported the Black Lives Matter movement by discussing the “specific vulnerability for African-Americans that needs to be addressed.”<sup>108</sup>

192. Recently, Defendant Obama supported San Francisco 49ers quarterback Colin Kaepernick’s decision to not stand for the singing of the National Anthem, stating, “[Kaepernick] cares about some real, legitimate issues that have to be talked about.”<sup>109</sup>

193. Not coincidentally, Defendant Obama made these statements of support in immediate aftermath following the Dallas Police Shooting, as a means to deflect attention away from his co-Defendants and instead cast blame on law enforcement officers.

194. Deneen Borelli (“Borelli”), an African-American political correspondent, has blamed Defendant Obama for “stoking the fire [on racial conflict in America] since day one” when Defendant Obama chose to reference Black Lives Matter during the memorial service for the officers who were murdered in the July 7, 2016 Dallas Police Shootings.<sup>110</sup>

195. On August 23, 2016, Borelli also stated that Defendant Obama has failed the black community and that his policies “have harmed the country and especially harmed the black community.”<sup>111</sup>

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<sup>108</sup> Soraya McDonald, *President Obama Clarifies his Definition of ‘Black Lives Matter’*, The Undefeated, July 14, 2016, available at: <http://theundefeated.com/features/president-obamas-clarifies-his-definition-of-black-lives-matter/>

<sup>109</sup> Kim Hjelmgaard, Obama Defends Kaepernick’s National Anthem Protest, USA Today, September 5, 2016, available at <http://www.usatoday.com/story/sports/nfl/2016/09/05/obama-defends-kaepernicks-national-anthem-protest/89879478/>

<sup>110</sup> Deneen Borelli: “He’s (Obama) been stoking the fire since day one”, YouTube Video, July 13, 2016, <https://www.youtube.com/watch?v=ZQ2x8QeqWso>

<sup>111</sup> Deneen Borelli, Obama Has Failed Blacks – Can Trump Win Them Over?, <https://www.conservativereview.com/commentary/2016/08/obama-has-failed-blacks-can-trump-win-them-over>

196. As early as January 24, 2011, Richard Roberts, spokesman for the International Union of Police Associations, explained, “It’s not a fluke. There’s a perception among officers in the field that there’s a war on cops going on.”

197. Defendant Obama still has not spoken on and thus endorsed the execution of Caucasian Sheriff Darren Goforth by black criminal Shannon J. Miles.<sup>112</sup>

198. Courageous African-American Milwaukee County Sheriff David Clarke blames a lack of presidential leadership by Defendant Obama for creating an atmosphere where protesters can openly call for the murder of police officers of all races and ethnicity without comment or action from the white House.<sup>113</sup>

199. Sheriff David Clarke of the Milwaukee Police Department charged the White House for creating an environment for over-the-top rhetoric and violence against police officers: “I said last December that war had been declared against the American police officer, led by some high-profile people. One of them coming out of the white House, another one coming out of the U.S. Department of Justice. And it’s open season right now, no doubt about it.” Later in the interview, the sheriff pointed his finger at the president himself: “That’s why I said the President of the United States started this ‘war on police.’”<sup>114</sup>

200. Sheriff Mike Lewis, Wicomico County, Maryland, states, including on Fox News (“The Sean Hannity Show”) on September 1, 2015, “You bet it is open season against law enforcement across this country. Law enforcement across this country is under siege.”

201. As a result of Defendant Obama’s actions and inactions to help perpetrate, incite, condone, ratify and further propagate the hateful and violent dogmatic beliefs of co-Defendants,

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<sup>112</sup> “Obama statement on murder of Deputy Goforth Shannon Miles,” August 30, 2015, accessible at: <http://www.fireandreamitchell.com/2015/08/30/obama-statement-on-murder-of-deputy-goforth-shannon-miles/>

<sup>113</sup> Becker, Independent Journal Review, August 29, 2015, *supra*.

<sup>114</sup> *Id.*

they have been allowed to spread and profligate, and has caused explosions of violence against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians, resulting in threats and severe bodily injury or death as pled herein against Plaintiffs and those similarly situated.

**H. Defendant Former Secretary of State Hillary Clinton**

202. Defendant Clinton served as Nation's 67<sup>th</sup> Secretary of State, from January 2009 until February 2013. Defendant Clinton is now the Democratic nominee in the upcoming November 2016 Presidential elections.

203. Defendant Clinton has used her position of great authority to perpetrate, incite, condone, ratify and further propagate the violence against law enforcement officers perpetrated by her co-Defendants, as set forth previously in this Amended Complaint. Defendant Clinton, as the Democratic nominee for President of the United States of America, carries great influence and when she affirmatively acts to perpetrate, incite, condone, ratify and further propagate the violent and hateful dogmas guiding her co-Defendants, the predictable result is the explosion of violence against law enforcement officers as set forth previously.

204. In July 2016, Defendant Clinton chose to give speaking slots to members of the co-Defendant BLM at the Democratic National Convention. The mothers of Trayvon Martin, Michael Brown, and Eric Garner were invited to speak.<sup>115</sup> Conversely, Defendant Clinton "blew off" the largest police union in the United States. "[T]he Clinton campaign appeared to string the

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<sup>115</sup> Nick Allen, *Police Union Attacks Hillary Clinton for Inviting Black Lives Matter Speakers to Convention*, Telegraph, July 26, 2016, available at: <http://www.telegraph.co.uk/news/2016/07/26/police-union-attacks-hillary-clinton-for-inviting-black-lives-ma/>

Fraternal Order of Police (FOP) on for a period of time until staff told the union Clinton would not seek its endorsement.”<sup>116</sup>

205. Similar to Defendant Obama, Defendant Clinton has met privately with the BLM Defendants in an attempt to drum up support from African American voters in the upcoming Presidential election.<sup>117</sup>

206. On July 18, 2016, in a speech at the NAACP annual convention, Defendant Clinton pushed the hateful and violent agenda of her co-Defendants by directly placing blame on law enforcement officers and saying the “systemic racism” needed to be eliminated. Defendant Clinton stated:

We were cruelly reminded of [how far we have to go] with the recent deaths of Alton Sterling and Philando Castile, two more black man killed in police incidents, this time in Louisiana and Minnesota.

and

The deaths of Alton and Philando...drove home how urgently we need to make reforms to policing and criminal justice... how we cannot rest until we root out implicit bias and stop the killings of African-Americans.

and

Let’s admit it, there is clear evidence that African-Americans are disproportionately killed in police incidents compared to any other group.<sup>118</sup>

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<sup>116</sup> Kerry Picket, *Clinton Chooses Black Lives Matter Over Law Enforcement Support*, The Daily Caller, August 6, 2016, available at <http://dailycaller.com/2016/08/06/clinton-chooses-black-lives-matter-over-law-enforcement-support/>

<sup>117</sup> Dan Merica, *Black Lives Matter Videos, Clinton Campaign Reveal Details of Meeting*, CNN, August 18, 2015, available at: <http://www.cnn.com/2015/08/18/politics/hillary-clinton-black-lives-matter-meeting/>

<sup>118</sup> Matthew Vadum, *Hillary, The Black Lives Matter Candidate*, Frontpage Mag, July 19, 2016, available at: <http://www.frontpagemag.com/fpm/263564/hillary-black-lives-matter-candidate-matthew-vadum>

207. Defendant Clinton has chosen not to denounce the hateful and violent message of Defendants NOI and NBPP, which given here status as a public figure and Presidential candidate, serves as ratification. She has thus furthered the threats and severe bodily injury or death against Plaintiffs and those similarly situated as pled herein.

208. As a result of Defendant Clinton's actions and inactions to help perpetrate, incite, condone, ratify and further propagate, the hateful and violent dogmatic beliefs of co-Defendants have been allowed to spread and profligate, and have caused explosions of violence against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians.

**I. Defendant Former Attorney General Eric Holder**

209. Defendant Holder served as the Nation's 82nd Attorney General.

210. Defendant Holder used his position of authority and influence to help perpetrate, incite, condone, ratify and further propagate the hateful and violent message and actions perpetrated by co-Defendants NOI, NBPP, and the BLM Defendants by improperly targeting law enforcement officers for investigation.

211. Throughout his time as Attorney General, Defendant Holder's Department of Justice ("DOJ") has publicly targeted and blamed America of "biased policing" and "implicit bias" in law enforcement.

212. Defendant Holder incited a civil war against police and law enforcement agents during his time as Attorney General.

213. According to reports, Defendant Holder spent more time investigating police departments than he did investigating criminals.

214. Sheriff David Clarke recently stated that it is now “open season” on police in the US, and blames Defendant Holder for laying the groundwork by supporting ‘activists’ who have disparaged law enforcement based upon a set of lies.<sup>119</sup>

215. Defendant Holder illegally acted outside of the authority of his public office to justify, endorse, and seek to reinforce, spread, and justify the false narrative that blacks are being targeted and hunted by police and other law enforcement persons and disproportionately arrested, prosecuted, and/or confronted in hostile incidents of resisting arrest, while concealing the reality that police officers are typically only responding to 911 calls for help from blacks and other minorities.

216. Without false propaganda and lies spread by Defendant Holder and the DOJ under his command inaccurately convincing blacks that they are being targeted by police and other law enforcement persons the violent uprising and civil war against police would not have occurred.

217. When the DOJ targeted the Seattle Police Department, for example, their letter stated that officers were engaging in “discriminatory practices subconsciously.”

218. Crime skyrocketed in Seattle as a result of its consent decree with the police.<sup>120</sup>

219. The DOJ has since failed to investigate any of the recent murders of police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians, committed by black activists, when the DOJ would have investigated these murders had it been the other way around, and the DOJ has in the past.<sup>121</sup>

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<sup>119</sup> Steve Watson, “Sheriff Clarke: Black Lives Matter Is A “Vulgar, Vile, Vicious, Slimy Movement,”” Infowars.com, September 1, 2015, accessible at: <http://www.infowars.com/sheriff-clarke-black-lives-matter-is-a-vulgar-vile-vicious-slimy-movement/>

<sup>120</sup> “Obama, Holder, Sharpton Stoke Flames, Ferguson Officers Shot,” Breitbart, March 12, 2015, *supra*.

<sup>121</sup> Sarah Fisher, “Former NYPD Commish Blames Eric Holder for ‘War on Police,’” Truth Revolt, May 11, 2015, accessible at: <http://www.truthrevolt.org/news/former-nypd-commish-blames-eric-holder-war-police>

220. As a result of Defendant Holder's actions and inactions, to help perpetrate, incite, condone, ratify and further propagate the hateful and violent dogmatic beliefs of co-Defendants, they have been allowed to spread and profligate, and have caused explosions of violence against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians, including threats and severe bodily injury or death against Plaintiffs and those similarly situated as pled herein.

**VI. CAUSES OF ACTION**

**FIRST CAUSE OF ACTION**  
***Deprivation of Civil Rights: Aiding and Abetting Murder***  
***(42 U.S.C. §1983)***

221. Plaintiffs and other members of the class herein repeat and re-allege each and every allegation of the foregoing paragraphs as if fully set forth herein.

222. By the acts and omissions all of the Defendants described above, the Defendants and each of them individually deprived the Plaintiffs of their constitutional rights to life and liberty guaranteed by the Fifth Amendment to the United States Constitution, as reinforced by the Fourteenth Amendment.

223. Plaintiffs and other members of the class herein have been injured in their person, property or business by reason of acts committed by Defendants that involve the aiding and abetting of violence or which are dangerous to human life and that violate the criminal laws of the United States, including violating the prohibition on killing, attempting to kill, causing serious bodily injury or attempting to cause serious bodily injury to police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians, and other members of the class as pled herein.

224. The acts of these radical black activists attempting to kill police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians were and are intended (a) to intimidate or coerce the population of police officers of all races and ethnicities, Jews, and Caucasians, (b) to influence the policy of the government of the United States, and (c) to affect the conduct of the government of the United States by violence and murder of innocent police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians

The acts of violence herein are extreme and outrageous and were committed with the knowledge of and intention to cause extreme physical pain and suffering to any and all persons within close proximity of these attack and extreme emotional distress to the family members of those who were killed or injured by reason of those acts.

225. Each of the Defendants provides substantial assistance to criminal activity by inciting people to attack police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians in retaliation of the oppression of black people, and by Defendant Obama and Defendant Holder's refusal to investigate past murders of innocent police officers police officers and law enforcement persons of all races and ethnicities by black and other persons.

226. Each of the Defendants knows, or has recklessly disregarded, that each Defendant is providing material support to criminals for acts of murder and violence to police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians.

227. Each of the Defendants knew or recklessly disregarded the fact that their activities alleged above have substantially assisted and encouraged and much more engaged in dangerous and criminal acts set forth herein.

228. By aiding and abetting black criminals have caused plaintiffs to be injured in his or her person, property, or business, Defendants are jointly and severally liable pursuant to 18 U.S.C. § 1983 for any and all damages that plaintiffs have sustained as a result of such injuries which they have caused to Plaintiffs and those similarly situated, as pled herein.

**SECOND CAUSE OF ACTION**

*Conspiracy to Deprive Plaintiffs of Civil Rights: Right to Life and Liberty  
(42 U.S.C. §1985)*

229. Plaintiffs and other members of the class herein repeat and re-allege each and every allegation of the foregoing paragraphs as if fully set forth herein.

230. Defendants have conspired together to knowingly and intentionally deprive the Plaintiffs and other members of the class herein of their constitutional and civil rights to life, liberty, and property in violation of 42 U.S.C. § 1985.

231. Defendants have conspired “to prevent, by force, intimidation, or threat, any person from accepting or holding any office, trust, or place of confidence under the United States, or from discharging any duties thereof; or to induce by like means any officer of the United States to leave any State, district, or place, where his duties as an officer are required to be performed, or to injure him in his person or property on account of his lawful discharge of the duties of his office, or while engaged in the lawful discharge thereof, or to injure his property so as to molest, interrupt, hinder, or impede him in the discharge of his official duties” in violation of 42 U.S.C. § 1985.

232. Each of the Defendants, acting in concert, jointly and severally, have committed overt and public acts in furtherance of the conspiracy.

233. Defendants have conspired and acted “for the purpose of impeding, hindering, obstructing, or defeating, in any manner, the due course of justice in any State or Territory, with intent to deny to any citizen the equal protection of the laws, or to injure him or his property for lawfully enforcing, or attempting to enforce, the right of any person, or class of persons, to the equal protection of the laws in violation of 42 U.S.C. § 1985(2).

234. Defendants have invaded and gone upon the premises or within the zone of privacy of Plaintiff and other members of the protected classes of persons for the purpose of threatening, intimidating, and frightening and harming the Plaintiffs and other members of the

class and depriving them of their constitutional and civil rights and also “for the purpose of preventing or hindering the constituted authorities of any State or Territory from giving or securing to all persons within such State or Territory the equal protection of the laws “ in violation of 42 U.S.C. § 1985(3).

235. Defendants agreed, including by implication or common understanding, to combine with each other, their agents, and other persons to act unlawfully, in the manner set forth in this Amended Complaint and committed overt acts in furtherance of the conspiracy.

236. At all relevant times, Defendants knew of this conspiracy and knew and knows, in particular, of the roles of charitable front organizations and their leaders in furtherance of that conspiracy

237. At a minimum, Defendants recklessly disregarded the nature and purposes of the conspiracy.

238. Defendants knowingly and purposefully agreed to perform the acts complained of herein with the knowledge, and for the purpose, that such services facilitate their mutual goals and support what are in effect racially and ethnically based terrorist activities pursuant to a common scheme to encourage and incentivize acts of violence and death against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians, including Plaintiffs and those similarly situated, as pled herein.

### **THIRD CAUSE OF ACTION**

*Fifth Amendment Violation: Deprivation of Right to Life  
(Bivens v. VI Unknown Named Agents of Federal Bureau of Narcotics)*

239. Plaintiffs and other members of the class herein repeat and re-allege each and every allegation of the foregoing paragraphs as if fully set forth herein.

240. Plaintiffs enjoy constitutional rights in their persons of not being deprived of life or liberty by actions of the government without due process of law, as guaranteed by the Fifth Amendment to the U.S. Constitution.

241. Plaintiffs and other members of the class herein have been injured in their persons and/or property by reason of acts committed by Defendants that involve the conspiracy to commit violence or which are dangerous to human life and that violate the criminal laws of the United States, including the prohibition on killing, attempting to kill, causing serious bodily injury or attempting to cause serious bodily injury to police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians.

242. The acts of radical black and other activists attempting to kill police officers and other law enforcement persons of all races and ethnicities, including but not limited to Jews, Christians and Caucasians were and are intended (a) to intimidate or coerce and harm the population of police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians, (b) to influence the policy of the government of the United States, and (c) to affect the conduct of the government of the United States by violence and murder of innocent police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians.

243. The acts of violence and murder set forth herein are extreme and outrageous and extremely harmful, and were perpetrated against Plaintiffs and those similarly situated as pled herein.

244. The violations of this liberty interest are compensable under *Bivens v. VI Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971).

**FOURTH CAUSE OF ACTION**  
***Assault***

245. Plaintiffs and other members of the class herein repeat and re-allege each and every allegation of the foregoing paragraphs as if fully set forth herein.

246. Defendants have placed Plaintiffs and all police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians in apprehension of an imminent harmful or offensive contact, and some have in fact suffered harmful, offensive bodily contact, and/or death.

247. Defendants' acts of promoting and/or carrying out actions of violence against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians were done with the intent to knowingly and purposefully place the Plaintiffs and other members of the class in fear of immediate and imminent severe bodily injury, physical danger, attacks, and/or execution, assassination, or death.

248. As a direct, foreseeable and proximate result of the conduct of Defendants, acting in concert, jointly and severally, as alleged hereinabove, Plaintiffs and other members of the class have suffered non-pecuniary damages in amounts to be proven at trial.

249. By reason of the wrongful conduct of Defendants, Plaintiff and other members of the class herein, including family members, have suffered conscious pain, suffering, severe emotional distress and the fear of imminent serious bodily injury or death, and have suffered pecuniary and economic damage, loss of support, loss of nurture, care and guidance, grief, anguish, loss of services, loss of society, and other mental and physical injuries.

**FIFTH CAUSE OF ACTION**  
***Intentional Infliction of Emotional Distress***

250. Plaintiffs repeat and re-allege each and every allegation of the foregoing paragraphs as if fully set forth herein.

251. Defendants' acts of inciting and/or carrying out actions of violence against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians were done with the intent to terrorize, threaten, intimidate, and frighten the Plaintiffs and class members, as well as to actually commit acts of violence against them.

252. Defendants' acts of promoting and/or carrying out actions of violence against police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians were willful malicious, deliberate, or were done with reckless indifference to the likelihood that such behavior would cause severe emotional distress and with utter disregard for the consequences of such actions.

253. The acts of violence and murder set forth herein were committed with the knowledge of and intention to cause extreme physical pain and suffering to any and all persons within close proximity of the attack and extreme emotional distress to the Plaintiff and other members of the class herein and/or family members of those who were killed or injured by reason of those acts, or were done with reckless indifference to the likelihood that such behavior would cause such severe emotional distress and with utter disregard for the consequences of such actions.

254. Defendants' conduct, each and every one of them, jointly and severally, was unreasonable and outrageous and exceeds the bounds usually tolerated by decent society, and was done willfully, maliciously and deliberately, or with reckless indifference, to cause Plaintiff

and other members of the class herein, severe mental and emotional pain, distress, and anguish and loss of enjoyment of life.

255. By reason of the wrongful conduct of Defendants, Plaintiffs and other members of the class herein, including their family members, have suffered conscious pain, suffering, severe emotional distress and the fear of imminent serious bodily injury or death, and have suffered pecuniary and economic damage, loss of support, loss of nurture, care and guidance, grief, anguish, loss of services, loss of society, and other mental and physical injuries.

256. Defendants, each and every one of them, conspiring and/or acting in concert, jointly and severally, undertook their actions willfully, wantonly, maliciously and in reckless disregard for Plaintiff's rights, and as a direct, foreseeable, and proximate result thereof plaintiffs suffered economic and emotional damage in a total amount to be proven at trial, therefore plaintiffs seeks punitive damages in an amount sufficient to deter Defendants and others from similar future wrongful conduct.

**SIXTH CAUSE OF ACTION**  
***Terrorist Promotion of Gang Activity under Florida Law***  
***(Plaintiff Larry Klayman Only)***

257. Plaintiff Larry Klayman, a citizen of Florida, herein repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein.

258. Pursuant to Florida Statutes 874.06 Civil cause of action.—

- (1) A person or organization establishing, by clear and convincing evidence, coercion, intimidation, threats, or other harm to that person or organization in violation of this chapter has a civil cause of action for treble damages, an injunction, or any other appropriate relief in law or equity. Upon prevailing, the plaintiff may recover attorney's fees in the trial and appellate courts and the costs of investigation and litigation that are reasonably incurred.

259. In violation of Florida Statutes 874.03, *et seq.*, the Defendants have violated Florida Statutes 874.05 by recruiting what is in effect a violent criminal gang Black Live Matters and other groups and persons such as Defendants threatening and carrying out arson, looting, rioting, assault, and the murder of police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians.

260. In further violation of Florida Statutes 874.03,*et seq.*, Defendants have violated

Florida Statutes 874.10 Directing the activities of a criminal gang.—Any person who knowingly initiates, organizes, plans, finances, directs, manages, or supervises criminal gang-related activity commits a felony of the first degree, punishable by imprisonment for a term of years not exceeding life or as provided in s. 775.082, s. 775.083, or s. 775.084.

261. By recruiting and inciting riots and criminal gangs and inciting them into an organized movement, Defendants have violated Florida law against the recruitment and organizing of violent criminal gangs, which were and are being used to threaten severe bodily injury or death with regard to Plaintiff Klayman.

#### **PRAYER FOR RELIEF**

Plaintiffs, on behalf of themselves and all members of the class including police officers and other law enforcement persons of all races and ethnicities including but not limited to Jews, Christians and Caucasians, demand that judgment be entered against Defendants, each and every one of them, jointly and severally, for compensatory and actual damages as a result of their demonstrable physical and emotional injury to Plaintiffs, punitive damages because of Defendants' callous and reckless indifference and malicious acts, and attorneys fees, costs, an award in excess of \$500,000,000.00 or \$1,500,000,000.00 in trebled damages where appropriate, punitive damages, and such other relief the Court may deem just and proper.

#### **JURY DEMAND**

Plaintiffs respectfully demand a jury trial on all issues so triable.

Dated: September 16, 2016

Respectfully submitted,  
/s/ Larry Klayman  
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